

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

TRULIANT FEDERAL CREDIT  
UNION,

Plaintiff,

v.

SUNTRUST BANKS, INC. and BB&T  
CORPORATION,

Defendants.

Civil Action No.: 19-CV-601

**DECLARATION OF RITA WEEKS**

**Table of Contents**

<b>Section</b>	<b>Paragraph Numbers</b>
<b>I. Introduction</b>	<b>¶¶ 1-2</b>
<b>II. TRU-Prefix Federal Trademark Registrations</b>	<b>¶¶ 3-9</b>
<b>III. Truliant Federal Credit Union Serves A Broad Geographic Area</b>	<b>¶¶ 10-13</b>
<b>IV. Nationwide Shared Branch Banking Services &amp; Fee-Free ATMs Offered To Plaintiff's Credit Union Members Through CO-OP Networks</b>	<b>¶¶ 14-22</b>
<b>V. Twenty-Four (24) Other Credit Unions And Banks Use TRU-Prefix Names</b>	<b>¶¶ 23-27</b>

<b>VI. Geographic Overlap Of Truliant Federal Credit Union And Third Party TRU-Prefix Financial Institutions</b>	<b>¶¶ 48-49</b>
<b>VII. Other Uses Of TRU-Prefix Marks By Financial Services, Real Estate Title Services, And Insurance Services</b>	<b>¶¶ 50-51</b>
<b>VIII. Uses of TRU-Prefix Marks For Consumer Products &amp; Services</b>	<b>¶ 52</b>
<b>IX. Third-Party Uses Of TRULIANT</b>	<b>¶¶ 53-56</b>
<b>X. Geographic Locations Of Truliant Federal Credit Union Branches Compared To Truist Branches</b>	<b>¶ 57</b>

## **I. Introduction**

1. I am an attorney admitted to practice in New York and California and am an attorney with Kilpatrick Townsend & Stockton LLP, counsel to the Defendants in this case. The information in this Declaration is based on my personal knowledge, research described in this declaration, review of documents produced in this case by Plaintiff, and other documents described in this declaration.
2. To prepare this Declaration, I:
  - a. Ordered and analyzed a commercial trademark search report, described below;
  - b. Reviewed Plaintiff Truliant Federal Credit Union's website;
  - c. Review the login screen and location search feature of Truliant Federal Credit Union's mobile application, TRU2GO;
  - d. Searched the Internet to identify (a) financial institutions, (b) providers of other financial services, real estate title services, and insurance services; and (c) providers of consumer products and services, who appear to use names or marks beginning with the letters "TRU";

- e. Reviewed the websites and certain social media pages of the located entities who appear to use names and/or marks beginning with the letters “TRU”;
- f. Searched the United States Patent and Trademark Office’s Trademark Electronic Search System (TESS) to identify federal trademark registrations owned by certain financial institutions using TRU-prefix marks;
- g. Reviewed the websites of CO-OP Financial Services;
- h. Searched the Internet to identify third-parties using TRULIANT;
- i. Reviewed Truliant Federal Credit Union’s March 2, 2020 amendment to its charter, defining its field of membership (produced by Plaintiff during discovery);
- j. Reviewed the locations of Truliant Federal Credit Union’s members (from a document produced by Plaintiff during discovery); and
- k. Analyzed the locations of Truliant Federal Credit Union branches in comparison to Truist Bank branches (formerly BB&T/SunTrust bank branches).

## II. TRU-Prefix Federal Trademark Registrations

3. On April 17, 2020, I ordered a trademark search from CompuMark, a company that provides commercial trademark search services. Because this search was intended to obtain information about federally-registered TRU-prefix marks that co-exist, I instructed CompuMark to search for active federal trademark applications and registrations beginning with the letters “TRU,” for all goods and services.
4. CompuMark delivered to me a report of the search results on April 20, 2020, which is **Exhibit 1**. The printed report is 20,810 pages.<sup>1</sup> Relevant portions of that report are summarized below.
5. The CompuMark report lists **9,599** active federal trademark registrations and applications for marks beginning with the letters TRU, in all International Classes of goods and services (1-45). Of the 9,599 active records, 7,463 are active registrations.

---

<sup>1</sup> Due to the large size of the report, Truist is manually filing **Exhibit 1** with the Court on a flash drive.




6. Class 36 within the Nice Classification, which is an international classification of goods and services used by the U.S. Patent and Trademark Office that includes services pertaining to financial affairs; monetary affairs; real estate affairs; and insurance. *See* **Exhibit 2**, World Intellectual Property Organization, 2020 Nice Classification, [https://www.wipo.int/classifications/nice/nclpub/en/fr/?basic\\_numbers=show&class\\_number=36&explanatory\\_notes=show&lang=en&menulang=en&mode=flat&notion=&pagination=no&version=20200101](https://www.wipo.int/classifications/nice/nclpub/en/fr/?basic_numbers=show&class_number=36&explanatory_notes=show&lang=en&menulang=en&mode=flat&notion=&pagination=no&version=20200101).
7. The report identifies **502** active registrations of TRU-prefix marks in International Class 36, which are services concerning “insurance; financial affairs; monetary affairs; real estate affairs.” *Id.* Attached as **Exhibit 3** is a table identifying those registrations, with information compiled from the CompuMark report.
8. I reviewed the 502 registrations in International Class 36 and narrowed them to the registrations covering financial and monetary services, which total approximately **320**. Attached as **Exhibit 4** is a table identifying those registrations, with information taken directly from the CompuMark report.


9. Excluding Plaintiff, the 51 following TRU-prefix marks registered in Class 36 are being used by certain banks and credit unions, with full details concerning the registrations attached as **Exhibit 5**, compiled from the CompuMark report.

Owner	Mark	Reg. No.	Services
TruEnergy Federal Credit Union	TRUEENERGY FEDERAL CREDIT UNION	6,014,801	36: Credit union services.
Truxton Trust Company	TRUXTON TRUST	4,548,754	36: Banking services; financial management services.
Trupoint Bank	TRUPOINT	3,916,581	36: Individual, commercial and small business banking and financial services. . .
Trupoint Bank	TRUPOINT BANK	3,083,284	36: Individual, commercial and small business banking and financial services. . .
Cincinnati Central Credit Union (now TruPartner Credit Union)	TRUPARTNER CREDIT UNION	4,952,527	36: Credit union services.
Fiberglas Federal Credit Union (now TrueCore Federal Credit Union)	TRUECORE FEDERAL CREDIT UNION	4,830,062	36: Credit union services. . .

Trustmark National Bank	TRUSTMARK	2,559,639	36: Banking services. . .
Trustmark National Bank	TRUSTMARK FINANCIAL SERVICES, INC.	2,433,197	36: Banking services. . .
Trustmark National Bank	TRUSTMARK	4,236,715	36: Banking services. . .
Trustmark National Bank	TRUSTMARK BANK	2,974,255	36: Banking services. . .
Trustmark National Bank	TRUSTMARK BANK & Design 	2,382,693	36: Banking services. . .
Trustmark National Bank	TRUSTTOUCHWEB	2,684,559	36: Banking services. . .
Trustmark National Bank	TRUSTMARK INVESTMENT ADVISORS	2,931,154	36: Financial services in the nature of financial consultation and investment advice.
Trustmark National Bank	TRUSTMARK BANKING AND FINANCIAL SOLUTIONS	2880332	36: Banking services. . .
Trustmark National Bank	TRUSTMARK MORTGAGE SERVICES	2,985,273	36: Banking and financial services. . . mortgage
Trustmark National Bank	TRUSTMARK SECURITIES	2,928,349	36: Investment services; financial services. . .
Trustmark National Bank	TRUSTMARK WEALTH MANAGEMENT	2,928,350	36: Banking services. . . brokerage
Trustmark National Bank	TRUSTMARK TAILORED WEALTH	5,950,918	36: Banking services. . .
TruMark Financial Credit Union	TRUMARK FINANCIAL	3,082,473	36: Credit union services.
TruMark Financial Credit Union	TRUMARK & Design	3,241,971	36: Credit union services.



			
Trustco Bank	TRUSTCO	2,671,259	36: Banking services. . .
Trustco Bank	TRUSTCO BANK	1,614,201	36: Banking services. . .
TruGrocer Federal Credit Union	TruGrocer	3,283,863	36: Credit union services.
66 Federal Credit Union (now Truity Credit Union)	TRUITY CREDIT UNION & Design 	4,504,824	36: Credit union services.
IT & S of Iowa, Inc. (dba TruBank)	TruBank	4,454,604	36: Banking and financial services. . .
IT & S of Iowa, Inc. (dba TruBank)	TRUBANK & Design 	4,455,121	36: Banking and financial services. . .
True Sky Credit Union	TRUE SKY CREDIT UNION	5,188,090	36: Banking services; online banking services; credit union services; online credit union services.
TrustTexas Bank	TRUSTTEXAS BANK	3,266,289	36: Financial services, namely banking services. . .
TrustTexas Bank	TRUSTTEXAS	3,266,288	36: Financial services, namely banking services. . .

TruWest Credit Union	TRUWEST	2,867,852	36: Credit union services.
TruWest Credit Union	TRUWEST & Design 	4,695,589	36: Credit union services.
TruStone Financial Federal Credit Union	TRU STONE	3,797,088	36: Credit union services.
TruStone Financial Federal Credit Union	TruStone Financial	5,295,173	36: Credit union services.
San Diego County Credit Union	TRUST BANKING AGAIN.	4,538,301	36: Credit union services.
San Diego County Credit Union	TRUST BANKING AGAIN	4,538,824	36: Credit union services.
San Diego County Credit Union	TRUSTED BETTER BANKING	4,530,423	36: Credit union services.
Rev Federal Credit Union, South Carolina Credit Union	TRUST IS EVERYTHING	3,659,085	36: Credit union services.
Tampa Bay Federal Credit Union	TRUEACCESS	2,032,092	36: Debit and check card services and automatic teller machine access services.
Intrust Financial Corporation	TRUST IN US	1,855,976	36: Banking services.
Kaw Valley Bank	TRUST IN THE STRENGTH OF THE KAW	4,752,848	36: Banking and financing services.
Bank Mutual Corporation	TRUST. THE FEELING IS MUTUAL.	2,819,862	36: Banking services.
Prairieland Bancorp, Inc.	TRUST-MART	1,780,572	36: Banking services, primarily

			consisting of acting as a fiduciary for others.
American National Bank & Trust	TRUST, IT'S OUR LAST NAME.	4,901,631	36: Banking services; estate trust management; estate trust planning.
Winfirst Financial Corp.	TRUST·SECURITY·CONFIDENCE	4,480,985	36: Banking services.
Pohl Consulting and Training, Inc.	TRUSTCOMPARE	3,601,239	36: Banking consultation.
Bank of America Corporation	TRUSTVIEW	1,779,825	36: Banking services.
Capitol Federal Savings Bank	TRUE BLUE ONLINE	4,581,144	36: Online banking services; banking, credit card processing, and related financial services. . .
Capitol Federal Savings Bank	TRUE BLUE	4,576,849	36: Online banking services; banking, credit card processing, and related financial services. . .
Capitol Federal Savings Bank	TRUE BLUE (stylized) <b>trueblue</b>	5,394,548	36: Online banking services accessible by means of

			downloadable mobile applications. . .
PCSB Bank	TRUE LOCAL. TRUE BANKING	4,291,850	36: Banking services.
Northway Bank	TRUE REWARDS	4,228,757	36: Banking services; online banking services.

### III. Truliant Federal Credit Union Serves A Broad Geographic Area

10. Plaintiff's website is located at <https://www.truliantfcu.org/>. True and correct copies of the homepage of that website and certain other of its webpages, referenced below, are attached as **Exhibits 6 - 12**. As shown in those exhibits, Plaintiff's website represents the following:

- a. Plaintiff promotes on its website that its members may bank with it at its Member Financial Centers and ATMs located in North Carolina, South Carolina, and Virginia, as well as through online banking and a mobile application. **Exhibit 7**, <https://www.truliantfcu.org/Ways-to-Bank/Branch-ATM-Locations>.
- b. Plaintiff's website also promotes that its members may conduct business outside of the areas where it has Member Financial Centers and ATMs, representing that it offers thousands of shared branch locations nationwide (*see infra*, ¶¶ 14 - 22), "which can be used at no-

cost, along with access to **thousands of surcharge-free ATMs worldwide.**” *Id.*

- c. Similarly, Plaintiff’s website promotes that its members may access their funds outside of Plaintiff’s Member Financial Centers and ATMs at **“more than 2 million ATM locations worldwide,”** through the following third-party ATM networks: Plus, Credit Union 24, Money Pass, Allpoint, and Alliance One. **Exhibit 8**, <https://www.truliantfcu.org/Personal-Banking/Accounts-Services/ATM-Debit-Cards/ATM-VISA-Debit-Cards>.
- d. Plaintiff’s website advertises that **“[v]irtually anyone can become a Truliant Federal Credit Union member and the process is easy!”** **Exhibit 9**, <https://www.truliantfcu.org/Become-a-Member/Become-a-Member-Online-Account-Opening>. Persons eligible to join Truliant Federal Credit Union include not only those who live where Plaintiff’s branches are located, but also persons meeting other criteria. The following persons are eligible to join Truliant Federal Credit Union:
  - i. Persons who live, work, worship, or attend schools in any one of many counties in North Carolina, South Carolina, or

Virginia identified on Plaintiff's website (**Exhibit 10**, <https://www.truliantfcu.org/Become-a-Member/Personal-Membership/Communities-We-Serve>);

- ii. Persons living in **Georgia** or **Tennessee**, or in areas of North Carolina, South Carolina, and Virginia that are outside of Truliant's service area, who join the American Consumer Council (*Id.*) (emphasis not in original) (joining is free – Plaintiff pays ACC a yearly fee to cover costs for any persons wanting to join Plaintiff's credit union through the option of joining ACC – *see* Exhibit 3 to Declaration of H. Forrest Flemming, III, filed contemporaneously with this Declaration (transcript of April 22, 2020 deposition of Plaintiff's FRCP 30(b)(6) witness, Christopher Murray, 17:7-10; 16:23-25));
- iii. Employees of more than 1,000 "Partner Companies" listed on Plaintiff's website. **Exhibit 11**, <https://www.truliantfcu.org/Become-a-Member/Personal-Membership/Truliant-At-Work-Partners-We-Serve>. The "Partner Companies" listed on Plaintiff's website include many businesses located outside of North Carolina, South

Carolina, and Virginia, where Plaintiff maintains branches. Plaintiff's website lists partner companies located in all regions of the country, including in the Northeast (**New York, New Jersey, Pennsylvania**), Midwest (**Ohio, Minnesota, Michigan, Indiana, Illinois, Missouri**), South (**Maryland, Kentucky, Florida, Georgia**, South Carolina, **Tennessee, Texas**), and West (**California, Oregon, Arizona, Colorado**). *Id.* (emphasis not in original); and

iv. Immediate family members of Truliant Federal Credit Union account holders. Exhibit 9.

e. Plaintiff offers mortgages and home equity loans in seven states: **Florida, Tennessee, North Carolina, South Carolina, Ohio, Virginia** and **Georgia**. **Exhibit 12**, <https://www.truliantfcu.org/Personal-Banking/Loans/Real-Estate-Loans/Mortgage-Loans> (emphasis not in original).

11. Plaintiff produced in discovery a March 2, 2020 amendment to its Charter, detailing the extensive list of employers and organizations whose employees and members are eligible to join Truliant Federal Credit Union, a copy of which is attached as **Exhibit 13**. The categories of eligible

persons include many located outside of North Carolina, South Carolina, and Virginia, where Plaintiff maintains branches, including at least persons located in **California, Colorado, Florida, Georgia, Massachusetts, Minnesota, Missouri, New Jersey, New York, Ohio, Pennsylvania, Tennessee, and Utah.** (emphasis not in original).

12. Plaintiff produced in discovery a document showing where its members live by State and by County within each state, a copy of which is attached as **Exhibit 14**. According to that document, Plaintiff has members in all 50 states and the District of Columbia. By way of example, Plaintiff has members in the following states, as noted:

13. Alabama: 205

14. Arizona: 221

15. California: 605

16. Colorado: 259

17. Florida: 2,450

18. Georgia: 1,871

19. Illinois: 318



20. Maryland: 556

21. Michigan: 192

22. Minnesota: 81

23. New Jersey: 269

24. New York: 434

25. Ohio: 1,797

26. Oklahoma: 80

27. Pennsylvania: 431

28. Tennessee: 808

29. Texas: 891

30. Washington: 163

31. West Virginia: 323

32. The document also shows that in North Carolina, South Carolina and Virginia, Plaintiff has members in counties outside of the geographic areas it claims as its service area. (*Id.*, see Exhibit 10,

<https://www.truliantfcu.org/Become-a-Member/Personal-Membership/Communities-We-Serve>) as follows:

North Carolina	18,077
South Carolina	7,884
Virginia	9,538

See **Exhibit 15** (spreadsheet of Plaintiff's members identified by state and county, with the counties in North Carolina, South Carolina, and Virginia that are outside of Plaintiff's service area, but in which Plaintiff has members, highlighted in yellow). Based on the information produced by Plaintiff, it has 49,187 members *outside* of the geographic area where it has branches. See **Exhibit 16** (spreadsheet of Plaintiff's members identified by state and county, with the counties throughout the United States that are outside of Plaintiff's service area, but in which Plaintiff has members, highlighted in yellow, and the counties comprising Plaintiff's stated service area highlighted in blue).

#### **IV. Nationwide Shared Branch Banking Services & Fee-Free ATMs Offered To Plaintiff's Credit Union Members**

33. Plaintiff's website advertises that in addition to its Truliant Federal Credit Union branches located in North Carolina, South Carolina, and Virginia, its

members may perform a range of banking transactions at other credit unions nationwide through a Shared Branch network. *See* ¶ 10(b); Exhibit 7, <https://www.truliantfcu.org/Ways-to-Bank/Branch-ATM-Locations>.

34. Specifically, Plaintiff's website advertises that the Shared Branch network "offers these helpful services":

- a. Deposits;
- b. Cash-back transactions or withdrawals (limit of \$1,000 per day);
- c. Balance inquiries;
- d. Account-to-account transfers that can be made between more than one credit union;
- e. Statement printouts, free for the last 10 transactions on an account;
- f. Loan payments (some credit unions may not allow access);
- g. Official checks, at \$2 per check (may be made payable only to the individual(s) listed on the account);
- h. Notary services at \$2 per notary signature; and
- i. VISA cash advances.

*See* **Exhibit 17**, <https://www.truliantfcu.org/Ways-to-Bank/Branch-ATM-Locations/Service-Centers-Shared-Branching>.

35. Plaintiff offers its members the ability to perform banking transactions at other credit unions nationwide through its partnership with CO-OP Financial Services ("CO-OP"). True and correct copies of webpages from

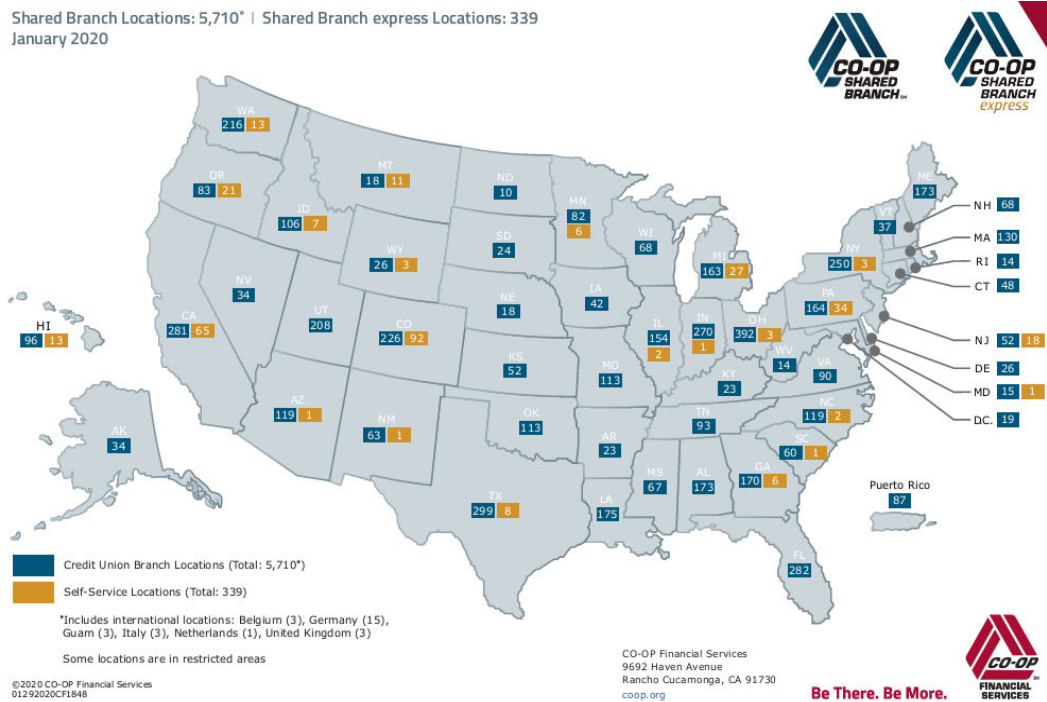
the homepages of CO-OP's corporate and consumer websites, and other webpages from those websites are attached as **Exhibits 18 - 24** (e.g., <https://co-opcreditunions.org>; <https://www.co-opfs.org>; <https://co-opcreditunions.org/tools>).

36. A credit union who participates in the CO-OP Shared Branch network allows members of other participating credit unions to access his or her accounts and conduct banking transactions at its branches, just as if the person was at his or her own credit union. **Exhibit 19**, <https://www.co-opfs.org/Solutions/Engage/CO-OP-Shared-Branch>.

37. A credit union who participates in the CO-OP ATM network allows members of other participating credit unions to use its ATMs to make surcharge-free withdrawals (and in some cases, make deposits), just as if the person was at his or her own credit union. **Exhibit 20**, <https://www.co-opfs.org/Solutions/Engage/CO-OP-ATM-Network>.

38. CO-OP's consumer website advertises: "CO-OP's nearly 30,000 ATMs and 5,000+ shared branches means you have more direct, surcharge-free access to your money than most traditional bank customers do." **Exhibit 21**, <https://co-opcreditunions.org/locator/>.

39. Attached as **Exhibit 22**, and shown below, is a map from CO-OP's website showing the number Shared Branches of its participating credit unions, nationwide, by state.



40. CO-OP's websites contain a search page to locate credit unions who participate in the CO-OP Shared Branch network or ATM network.

**Exhibit 23**, <https://www.co-opfs.org/Shared-Branches-ATMs>; <https://co-opcreditunions.org/locator/>. One may search by location or name.










41. Using the search tool on the CO-OP website, I identified that **14 credit unions** in the United States, which are detailed further in Section V below, using TRU-prefix names participate in CO-OP's Shared Branch and ATM networks, including Plaintiff (*see Exhibit 24*, web capture of search results):

- a. **Truliant Federal Credit Union** (CO-OP Shared Branch network)
- b. **TruEnergy Federal Credit Union** (CO-OP Shared Branch network and ATM network)
- c. **TrueCore Federal Credit Union** (CO-OP Shared Branch network and ATM network)
- d. **TruPartner Credit Union** (CO-OP Shared Branch network)
- e. **Trust Federal Credit Union** (CO-OP Shared Branch network)
- f. **TruGrocer Federal Credit Union** (CO-OP Shared Branch network and ATM network)
- g. **TruChoice Federal Credit Union** (CO-OP Shared Branch network and ATM network)
- h. **TruStone Financial Federal Credit Union** (CO-OP ATM network)









- i. **TruService Community Federal Credit Union** (CO-OP Shared Branch network and ATM network)
- j. **True North Federal Credit Union** (CO-OP Shared Branch network and ATM network)
- k. **TruMark Financial Credit Union** (CO-OP Shared Branch network)
- l. **TruWest Credit Union** (CO-OP Shared Branch network and ATM network)
- m. **True Sky Credit Union** (CO-OP Shared Branch network)
- n. **Truity Credit Union** (CO-OP Shared Branch network)








**V. Twenty Four (24) Other Credit Unions And Banks Use TRU-Prefix Names**

42. In addition to the 14 above-referenced credit unions, my research identified 11 other credit unions and banks in the United States who are using names beginning with “TRU.” Excluding Plaintiff, this is a total of 24 financial institutions. Those 24 banks and credit unions, along with the location of their headquarters and branches, are summarized in the table below, and each is discussed in greater detail thereafter.

Entity	Mark & Logo	Locations
TruEnergy Federal Credit Union		HQ: Springfield, VA Total branches: 1 -1 in Springfield, VA -7 ATMs in VA, MD, DC
True Core Federal Credit Union		HQ: Newark, OH Total branches: 2 in OH
TruPartner Credit Union		HQ: Cincinnati, OH Total branches: 3 in Cincinnati, OH
Trust Federal Credit Union		HQ: Chattanooga, TN Total branches: 4 in Chattanooga, TN
TruGrocer Federal Credit Union		HQ: Boise, ID Total branches: 7 -1 in each: AZ, CA, FL, ID, ME, TX
TruPoint Bank		HQ: Grundy, VA Total branches: 12 -10 in VA -1 in NC -1 in TN
Trustar Bank		-1 branch in Great Falls, VA -Commercial lending office in McLean, VA
Trustco Bank		HQ: Glenville, NY Total branches: 148 -88 in NY -53 in FL -4 in MA -2 in NJ -1 in VT
Trustmark National Bank		HQ: Jackson, MS Total branches: 216 -190 in MS



Entity	Mark & Logo	Locations
		-65 in AL -27 in FL -19 in TN -15 in TX
The Trust Bank		HQ: Lenox, GA Total branches: 3 in GA
Truxton Trust		HQ: Nashville, TN Total offices: 2 -1 in Nashville, TN -1 in Athens, GA
TruWest Credit Union		HQ: Phoenix, AZ Total branches: 14 -10 in AZ -4 in TX
TruChoice Federal Credit Union		HQ: Portland, ME Total branches: 3 in Portland, ME
TruService Community Federal Credit Union		HQ: Little Rock, AR Total branches: 3 in AR
TruNorth Federal Credit Union		HQ: Ishpeming, MI Total branches: 3 in MI
True North Federal Credit Union		HQ: Juneau, AK Total branches: 3 -2 in Juneau -1 in Anchorage
TruMark Financial Credit Union		HQ: Fort Washington, PA Total branches: 26 in PA

Entity	Mark & Logo	Locations
TruStar Federal Credit Union		HQ: MN Total branches: 6 in MN
TruStone Financial Federal Credit Union		HQ: Plymouth, MN Total branches: 15 -1 in MN -4 in WI
True Sky Credit Union		HQ: Oklahoma City, OK Total branches: 9 in OK
Truity Credit Union		HQ: Bartlesville, OK Total branches: 7 -4 in OK -2 in KS -1 in AR
TruBank		HQ: Indianola, IA Total branches: 8 in IA
TrustBank		HQ: Olney, IL Total branches: 7 -4 in IL -3 AZ
TrustTexas Bank		HQ: Cuero, TX Total branches: 6 in TX

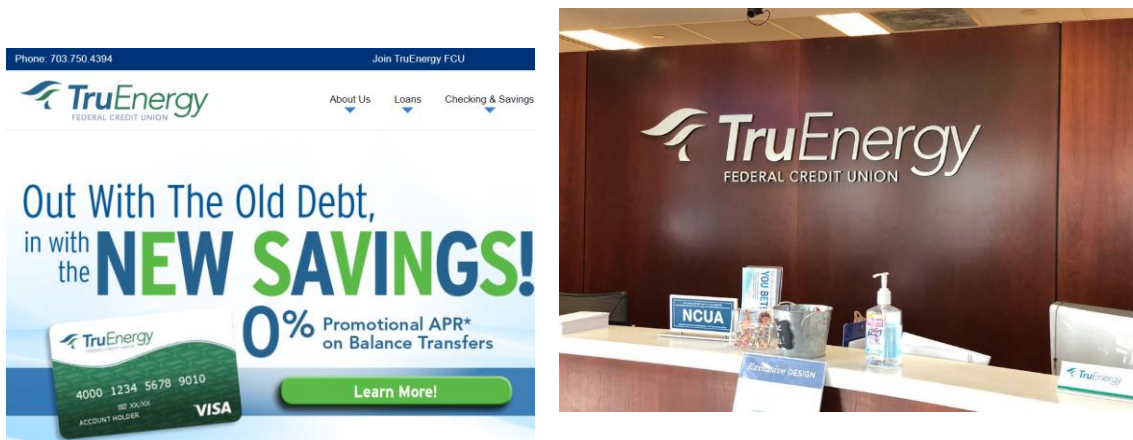
#### 43. TruEnergy Federal Credit Union

- a. True and correct copies of various webpages from TruEnergy Federal Credit Union's website (located at <https://www.truenergyfcu.org>) and Facebook page (located at

<https://www.facebook.com/truenergyfcu/photos/a.153515718039607/2235202163204275/?type=3&theater>) are attached as **Exhibits 25,**

**27-29**, and identify that:

- i. TruEnergy Federal Credit Union is using the mark and logo shown below:



- b. TruEnergy Credit Union owns the following federal registrations for its TRU-marks (*see Exhibit 26*, registration certificates and TSDR status and title records):

- i. **TRUEENERGY FEDERAL CREDIT UNION:** Reg. No. 6,014,801 (Class 36: credit union services)



- ii. : Reg. No. 6,014,803 (Class 36: credit union services)
- c. The credit union also uses **TRUNEWS** for its membership newsletter. **Exhibit 27**, <https://www.truenergyfcu.org/about/newsletters>.
- d. TruEnergy Federal Credit Union's headquarters and its one branch are located in Springfield, Virginia (**Exhibit 28**, <https://www.truenergyfcu.org/branch-atm-locations>), which is located in Fairfax County. TruEnergy Federal Credit Union has 170 members located in Fairfax County. *See* Exhibit 14.
- e. Additionally, TruEnergy Federal Credit Union has seven ATMs located in Virginia, Maryland, and Washington, DC. **Exhibit 28**. TruEnergy Federal Credit Union has approximately 23,285 members located in Virginia, Maryland, and Washington, DC. *See* Exhibit 14.
- f. Persons eligible to join TruEnergy Federal Credit Union include, among other persons, employees of approximately 29 approved companies or organizations within its charter (*see* **Exhibit 29**, <https://www.truenergyfcu.org/select-employee-groups>), including

entities located in cities where Plaintiff has branches, such as **Charlotte** (**Exhibit 30**, American Security Mortgage, [https://americansecuritymortgage.com/indExhibit\\_php?p=contact](https://americansecuritymortgage.com/indExhibit_php?p=contact); **Exhibit 31**, Michael and Son, <https://www.michaelandson.com/find-a-location>); as well as in cities and counties where Plaintiff has members. Those include:

- i. **Charlotte**, in Mecklenburg County, North Carolina, where Plaintiff has 37,338 members (*Id.*; Exhibit 14);
- ii. **Raleigh**, in Wake County, North Carolina (Exhibit 31, Michael and Son), where Plaintiff has 2,443 members (Exhibit 14);
- iii. **Richmond, Virginia** (Exhibit 31, Michael and Son), where Plaintiff has 547 members (Exhibit 14);
- iv. **Wilmington**, in New Hanover County, North Carolina (Michael and Son, Exhibit 31), where Plaintiff has 391 members (Exhibit 14);
- v. **Woodbridge**, in Prince William County, Virginia (**Exhibit 32**, Aver Technologies Inc.,



<https://www.linkedin.com/company/aver-technologies-inc/about/>), where Plaintiff has members (Exhibit 14);

- vi. **Chesapeake, Virginia** (Exhibit 31, Michael and Son), where Plaintiff has members (Exhibit 14);
- vii. **Alexandria, Virginia** (Exhibit 31, Michael and Son), where Plaintiff has members (Exhibit 14);
- viii. **Falmouth**, in Stafford County, Virginia (Exhibit 31, Michael and Son), where Plaintiff has members (Exhibit 14);
- ix. **Ruckersville**, in Greene County, Virginia (Exhibit 31, Michael and Son), where Plaintiff has members (Exhibit 14);
- x. **Manassas, Virginia** (Exhibit 33, Team America Contractors, Inc., <https://www.facebook.com/Team-America-Contractors-Inc-479988742041472/>), where Plaintiff has members (Exhibit 14); and
- xi. **Fairfax, Virginia** (Exhibit 34, CroppMetcalf, <https://www.croppmetcalfe.com/contact-us/service-request/>) where Plaintiff has members (Exhibit 14).

- g. TruEnergy Federal Credit Union participates in the CO-OP Shared Branch network and ATM network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at the TruEnergy Federal Credit Union branch, and its 7 ATMs. Similarly, TruEnergy Federal Credit Union members may conduct banking transactions at Truliant Federal Credit Union branches.
- h. TruEnergy Federal Credit Union offers insurance services through third-party TruStage Insurance, as shown in **Exhibit 35** (<https://www.truenergyfcu.org/about/news/what-is-trustage-insurance-program>).

#### 44. **TruGrocer Federal Credit Union**

- a. True and correct copies of various webpages from TruGrocer Federal Credit Union's website (located at <https://www.trugrocer.com>) are attached as **Exhibits 36-37**, and **39-43**, and identify that:
  - i. TruGrocer Federal Credit Union is using the mark and logo shown below. **Exhibit 37**,

<https://www.trugrocer.com/Access/Your-Accounts/ATM-POS-Debit-Card.aspx>.



- b. TruGrocer Federal Credit Union owns the following federal trademark registration (*see* **Exhibit 38**, registration certificate and TSDR status and title record):
  - i. **TruGrocer**: Reg. No. 3,283,863 (Class 36: credit union services)
- c. TruGrocer Federal Credit Union has seven branch locations across the United States, including in Arizona, California, Florida, Idaho, Maine, and Texas. **Exhibit 39**, <https://www.trugrocer.com/Locations-Hours.aspx>. Plaintiff has approximately 4,235 members located in those states. *See* Exhibit 14. TruGrocer promotes that it has at least



one branch office in each of the four time zones of the continental United States, and a member's service branch will be assigned after they join. **Exhibit 40,**

<https://www.trugrocer.com/Join/Eligibility.aspx>.

- d. TruGrocer Federal Credit Union is chartered specifically to serve grocery industry workers throughout the entire United States. *See* **Exhibit 41,**  
<https://www.trugrocer.com/Documents/Miscellaneous/Employer-Presentation.aspx>.
- e. Persons who are eligible to join include: (a) employees or retirees of a supermarket or grocery store; (b) persons who are family members of or live with a supermarket or grocery store employee; and (c) family members of a current TruGrocer member. **Exhibit 40.**  
Persons falling within those categories necessarily live in the states where Plaintiff has branches, North Carolina, South Carolina, and Virginia, because supermarkets and grocery stores exist in those states.

- f. As of March 31, 2020, TruGrocer Federal Credit Union has 26,388 members. *See* **Exhibit 42**, <https://www.trugrocer.com/Join/Publications.aspx>.
- g. TruGrocer Federal Credit Union participates in the CO-OP Shared Branch network and ATM network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at TruGrocer's seven branches, and ATMs. Similarly, TruGrocer Federal Credit Union members may conduct banking transactions at Truliant Federal Credit Union branches.
- h. TruGrocer Federal Credit Union offers insurance services through third-party TruStage Insurance, as shown in **Exhibit 43**, <https://www.trugrocer.com/Features/Insurance/Overview.aspx>.

#### **45. Trust Federal Credit Union**

- a. True and correct copies of various webpages from Trust Federal Credit Union's website (located at <https://www.trustfcu.com/>) and Facebook page (located at <https://www.facebook.com/trustfcu/photos/a.385869979406/101550>

[16024144407/?type=3&theater](#)) are attached as **Exhibits 44 – 46**

and identify that:

- i. Trust Federal Credit Union is using the mark and logo shown below:



- ii. Trust Federal Credit Union is headquartered in Chattanooga, TN. It has four (4) branches in Chattanooga, Tennessee, which is located in Hamilton County. **Exhibit 45**, <https://www.trustfcu.com/locations.html>. Truliant Federal Credit Union has members in Hamilton County. *See Exhibit 14.*

- iii. Persons eligible to join Trust Federal Credit Union include, among other persons, anyone who becomes a member of the Chattanooga Audubon Society (\$45 annual membership).

**Exhibit 46,** <https://www.trustfcu.com/membership.html>.

- b. Trust Federal Credit Union participates in the CO-OP Shared Branch network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at Trust Federal Credit Union's branches. Because Truliant Federal Credit Union also participates in the CO-OP Shared Branch network, Trust Federal Credit Union members may conduct banking transactions at Truliant Federal Credit Union branches.
- c. Persons who search Plaintiff's website and mobile application for locations of CO-OP financial institutions will be shown listings for Trust Federal Credit Union, as shown below in search results that I obtained from doing so.

Search results from: <https://www.truliantfcu.org/Ways-to-Bank/Branch-ATM-Locations>

Locate

Enter a location:  
Chattanooga, TN, USA Go

Find Me

Search by all that apply:

☐ Truliant FCU Branches

☐ Surcharge-Free ATMs

☐ Deposit Taking ATMs

☒ CO-OP Shared Branch

Results

**TRUST FCU**  
2186 Northgate Park Ln  
Chattanooga, TN 37415  
(423) 870-7613  
7.21 miles  
Send To: [Email](#) | [Mobile](#)  
[Hours](#) | [Get Directions](#)

**TRUST FCU**  
1529 Gunbarrel Rd  
Chattanooga, TN 37421  
(423) 870-7610  
8.55 miles  
Send To: [Email](#) | [Mobile](#)  
[Hours](#) | [Get Directions](#)

**Scenic Community CU**  
8821 Consolidated Dr  
Soddy Daisy, TN 37379  
(423) 875-6955  
13.28 miles  
Send To: [Email](#) | [Mobile](#)  
[Hours](#) | [Get Directions](#)

**Scenic Community CU**

[Print](#) | [Download To GPS](#) Fullscreen

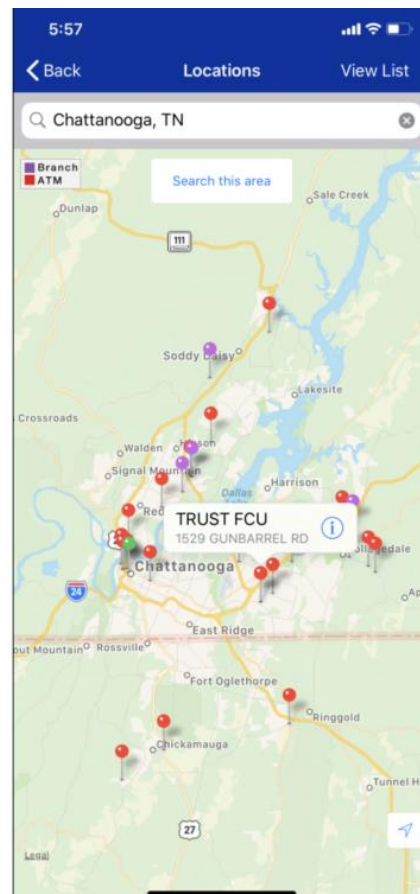
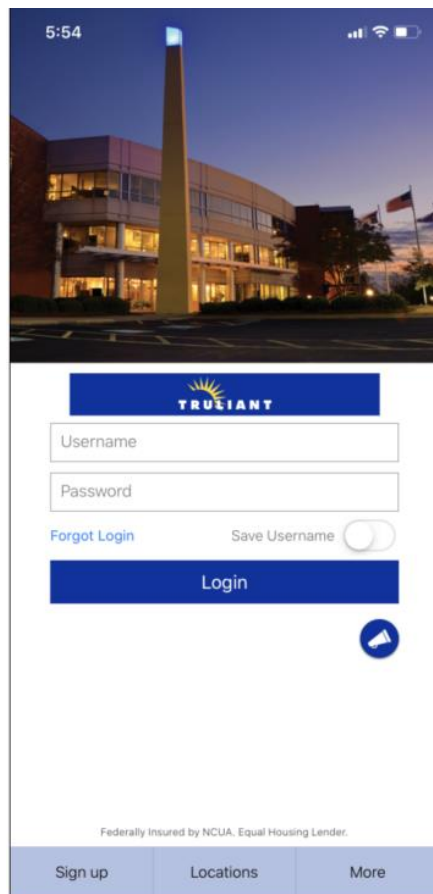
Map Satellite

Address Hours

**TRUST FCU**  
2186 Northgate Park Ln  
Chattanooga, TN 37415  
(423) 870-7613  
7.21 miles

Directions (Address, City, or Zip Code):  
Chattanooga, TN, USA Go

Search results using the “locations” feature of Truliant Federal Credit Union’s TRU2GO mobile application



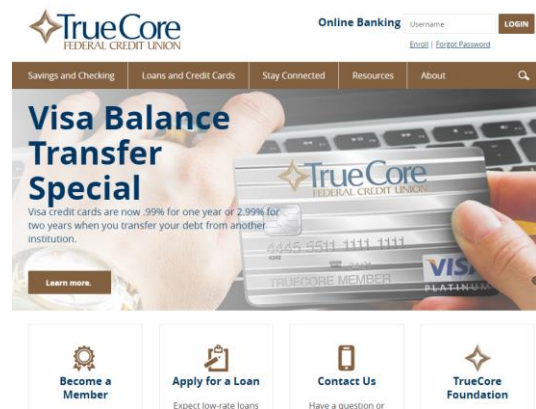
#### 46. TrueCore Federal Credit Union

- a. True and correct copies of various webpages from TrueCore Federal Credit Union’s website (located at <https://www.truecore.org/>) and Facebook page (located at

<https://www.facebook.com/truecorefederal/photos/a.326308671634/10156976304961635/?type=3&theater>) and other documents

pertaining to the credit union are attached as **Exhibit 174** and identify that:

- i. TrueCore Federal Credit Union is using the mark and logo shown below:



- b. TrueCore Federal Credit Union owns the following federal trademark registration for its TRU-prefix mark (Exhibit 174, registration certificate and TSDR status and title record):
  - i. **TRUECORE FEDERAL CREDIT UNION:** Reg. No. 4,952,527 (Class 36: credit union services)

- c. TrueCore Federal Credit Union also uses **TRUEPERKS** for its membership rewards program (Exhibit 174, <https://www.facebook.com/truecorefederal/photos/a.326308671634/10156543432951635/?type=3&theater>):



- d. TrueCore Federal Credit Union also uses **TRUECORE FOUNDATION** for its charitable foundation that supports unmet community needs, as shown below (Exhibit 174, <https://www.truecore.org/resources/truecore-foundation>):



## TrueCore Foundation

TrueCore Federal Credit Union's mission is to improve the financial well-being of its members. Giving back to the community has always been a priority at TrueCore, both through financial contributions and employee volunteerism. That is why TrueCore Federal Credit Union has introduced the TrueCore Foundation.

The TrueCore Foundation is a 501(c)(3), non-profit organization, supported by TrueCore Federal Credit Union. The volunteer Board of Directors is comprised of a diverse group of credit union employees with a mission to improve the lives of others by fulfilling needs in our community. The TrueCore Foundation aims to address causes of all sizes, fulfilling unmet needs in our communities.



- e. The credit union is headquartered in Newark, OH, with three branches in Cincinnati, OH. Exhibit 174, <https://www.truecore.org/stay-connected/contact-us>. Plaintiff has members in Licking and Hamilton counties, where Newark and Cincinnati are located. *See* Exhibit 14.
- f. TrueCore Federal Credit Union participates in the CO-OP Share Branch network and ATM network. Exhibit 24. Therefore, TruCore Federal Credit Union members may conduct banking transactions at any of TrueCore Federal Credit Union's branches and ATMs. Similarly, members of TrueCore Federal Credit Union may conduct banking transactions at TruCore Federal Credit Union's branches.

- g. TruCore Federal Credit Union offers insurance services through third-party TruStage Insurance. Exhibit 174, <https://www.truecore.org/loans-and-credit-cards/insurance-products>.
- h. Persons who search Plaintiff's website and mobile application for locations of CO-OP financial institutions will be shown listings for TrueCore Federal Credit Union, as shown below in search results that I obtained from doing so.

Search results from: <https://www.truliantfcu.org/Ways-to-Bank/Branch-ATM-Locations>

**Locate**

Enter a location:  
 **Go**

**Find Me**

Search by all that apply:  
☐ Truliant FCU Branches  
☒ Surcharge-Free ATMs  
☒ Deposit Taking ATMs  
☒ CO-OP Shared Branch

**Results**

TrueCore Federal Credit Union  
18 N 2nd St  
Newark, OH 43055  
0.06 miles  
Send To: [Email](#) | [Mobile](#)  
[Get Directions](#)

TrueCore FCU  
18 N Second St  
Newark, OH 43055  
(740) 345-6608  
0.06 miles  
Send To: [Email](#) | [Mobile](#)  
[Hours](#) | [Get Directions](#)

TrueCore Federal Credit Union  
18 N. 2nd Street  
Newark, OH 43055  
0.06 miles  
Send To: [Email](#) | [Mobile](#)  
[Get Directions](#)

TrueCore FCU ATM  
18 N. SECOND ST.  
NEWARK, OH 43055  
0.06 miles  
Send To: [Email](#) | [Mobile](#)  
[Get Directions](#)

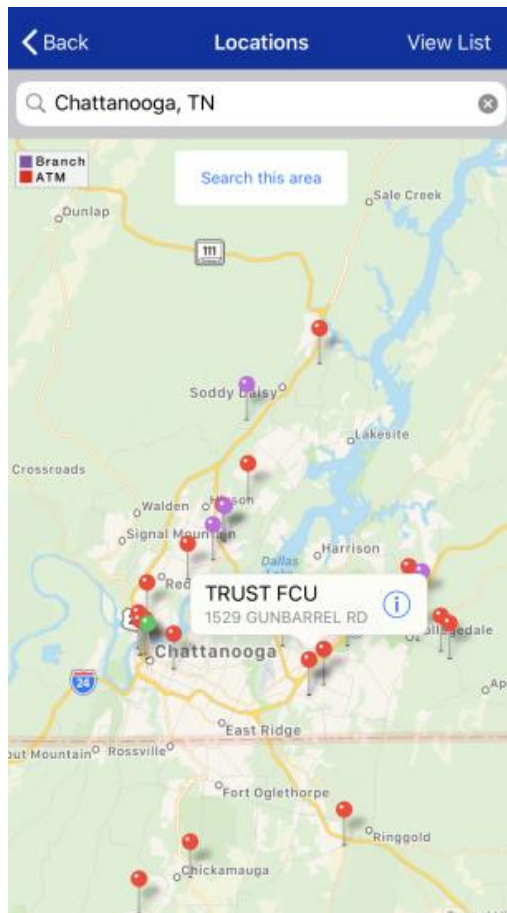
[Print](#) | [Download To GPS](#) [Fullscreen](#)

**Map** **Satellite**

Address Hours

TrueCore FCU  
18 N Second St  
Newark, OH 43055  
(740) 345-6608  
0.06 miles

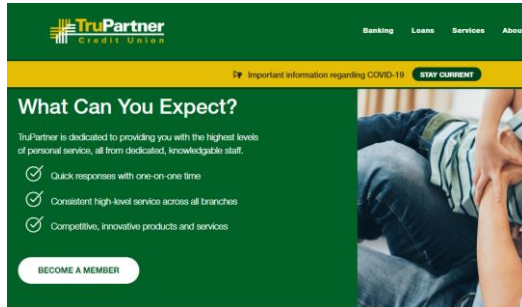
Directions (Address, City, or Zip Code):  
 **Go**



#### 47. TruPartner Credit Union

- a. True and correct copies of various webpages from TruPartner Federal Credit Union's website (located at <https://trupartnercu.org/>) and its Facebook page (located at <https://www.facebook.com/TruPartnerCU/photos/a.204682252906575/2239600906081356/?type=3&theater>) are attached as **Exhibits 47, 49-50**, and identify that:

- i. TruPartner Credit Union is using the mark and logo shown below:



- b. TruPartner Credit Union owns the following federal registration for its TRU-prefix mark (see **Exhibit 48**, registration certificate and TSDR status and title record):

- i. **TRUPARTNER CREDIT UNION**: Reg. No. 4,952,527  
(Class 36: credit union services)

- c. TruPartner Credit Union also uses **TRUBENEFITS** and **TRUADVANTAGES** for its bank account membership tiers.  
**Exhibit 49**, <https://trupartnercu.org/join-us/>.

## TruBenefits

Qualifying for TruBenefits requires an aggregate monthly balance of \$2,500. This total includes the balances in both your savings and in your loan accounts. You are also required to use Online Banking, Mobile Banking and/or Audio Access two times per month; use your Debit and/or Credit Card ten times monthly; and utilize eStatements to earn the following rewards.

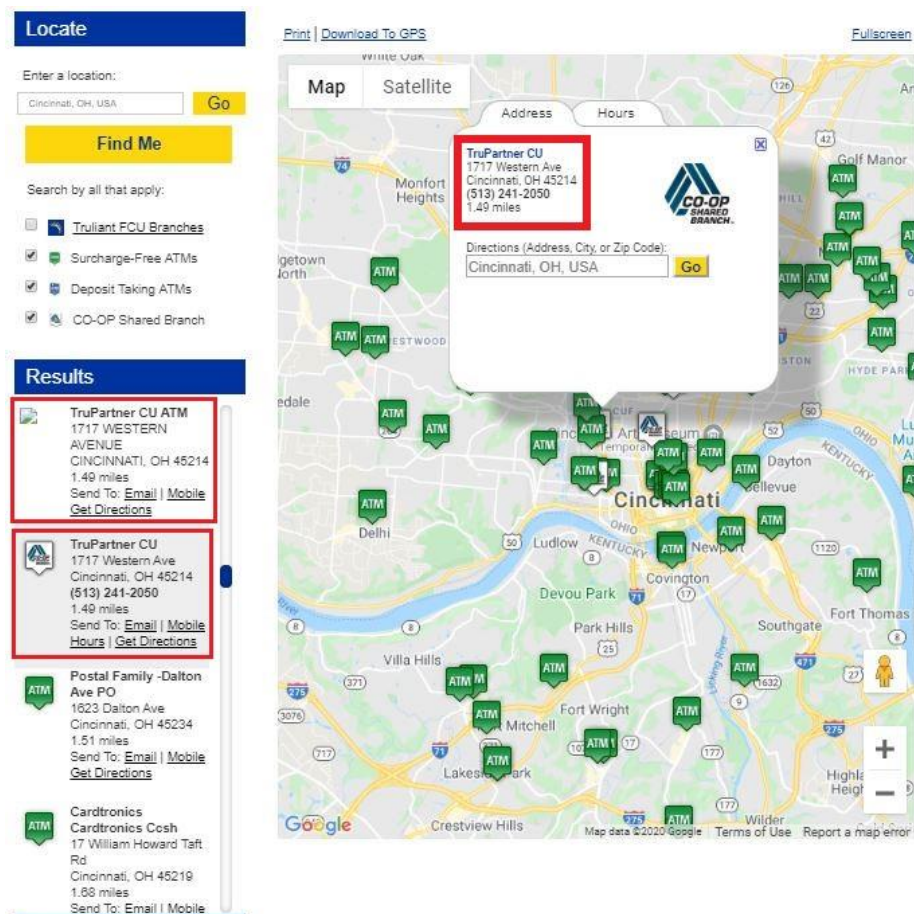
## TruAdvantages

To qualify for TruAdvantages requires an aggregate monthly balance of \$10,000. This total includes the balances in both your savings and in your loan accounts. You also need to use Online Banking, Mobile Banking and/or Audio Access two times per month; use your Debit and/or Credit Card five times monthly; and utilize eStatements to earn the following rewards.

- d. TruPartner Credit Union is headquartered in Cincinnati, OH, with three branches in Cincinnati, OH. **Exhibit 50**, <https://trupartnercu.org/location-branches>. Plaintiff has members located in Hamilton County, where Cincinnati is located. *See* Exhibit 14.
- e. TruPartner Credit Union participates in the CO-OP Shared Branch network. *See* Exhibit 24. Therefore, TruPartner Federal Credit Union members may conduct banking transactions at any of TruPartner Credit Union's branches. Similarly, TruPartner Federal Credit Union members may conduct banking transactions at TruPartner Federal Credit Union's branches.
- f. TruPartner Credit Union offers insurance services through third-party TruStage Insurance, as shown in **Exhibit 51** (<https://trupartnercu.org/services/love-my-credit-union/>).



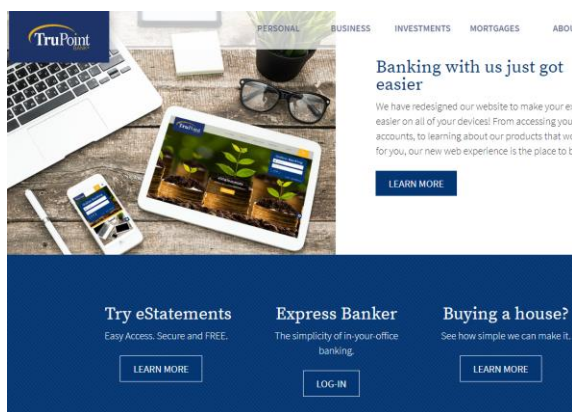
- g. Persons who search Plaintiff's website and mobile application for locations of CO-OP financial institutions will be shown listings for TruPartner Credit Union, as shown below in search results that I obtained from doing so.



#### 48. TruPoint Bank

- a. True and correct copies of various webpages from TruPoint Bank's website (located at <https://www.trupointbank.com/>) are attached as **Exhibit 52, and 54-56** and identify that:

- i. TruPoint Bank is using the mark and logo shown below:



- b. TruPoint Bank owns the following federal registrations for its TRU-prefix marks (*see* **Exhibit 53**, registration certificates and TSDR status and title records):

- i. **TRUPOINT**, Reg. No. 3,916,581 (Class 36: Individual, commercial and small business banking and financial services, namely, checking accounts, savings accounts, issuing

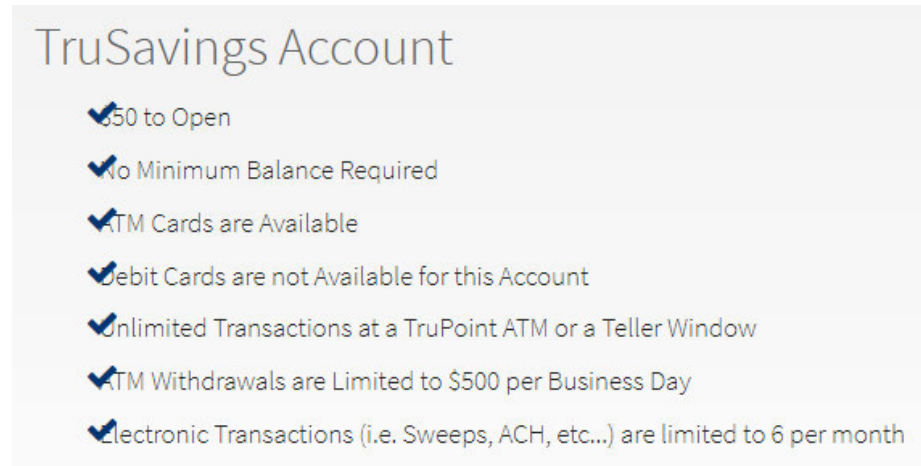


certificates of deposit, providing unsecured personal lines of credit, consumer loans, mortgage loans and home equity loans, and bill payment services, and providing such services by traditional methods, by telephone, and by a global computer network, and safe deposit box rental, excluding financial analysis and consultation).

- ii. **TRUPOINT BANK**, Reg. No. 3,083,284 (Class 36: Individual, commercial and small business banking and financial services, namely checking accounts, savings accounts, issuing certificates of deposit, providing unsecured personal lines of credit, consumer loans, mortgage loans and home equity loans, and bill payment services, and providing such services by traditional methods, by telephone, and by a global computer network, and safe deposit box rental).

- c. TruPoint Bank also uses **TRUSAVINGS** for its savings account offerings (see **Exhibit 54**, <https://www.trupointbank.com/Savings.aspx>), and **TRUPOINT INVESTMENTS** for its financial planning and insurance services

(see **Exhibit 55**, <https://www.trupointbank.com/Investment-About-Us.aspx>).



- d. TruPoint Bank is headquartered in Grundy, Virginia, and currently has 12 branches throughout southwest Virginia, northeast Tennessee, and western North Carolina. (See **Exhibit 56**, <https://www.trupointbank.com/Locations.aspx>.) Plaintiff has approximately 516 members located in the counties where TruPoint Bank has branches. See Exhibit 14. TruPoint Bank also previously operated a loan production office located in Winston-Salem. (See p. 5 of **Exhibit 57**, Annual Report of Holding Companies filed by Miners and Merchants Bancorp. Inc. on December 31, 2018, <https://www.richmondfed.org/->

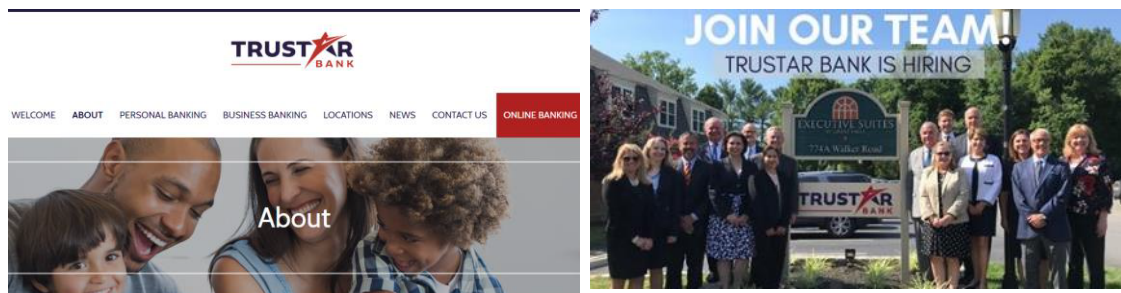
[/media/richmondfedorg/banking/supervision and regulation/fry6 a  
nnual reports/2018/batch09/2227687\\_20181231.pdf](/media/richmondfedorg/banking/supervision_and_regulation/fry6_a_nnuual_reports/2018/batch09/2227687_20181231.pdf).) Winston-

Salem is within Forsyth County, North Carolina, where Plaintiff has approximately 28,794 members. *See* Exhibit 14.

#### 49. Trustar Bank

- a. True and correct copies of various webpages from Trustar Bank's website (located at <https://www.trustarbank.com/>) are attached as **Exhibits 58, and 60-63** and identify that:

- i. Trustar Bank is using the mark and logo shown below:



- b. Trustar Bank owns a published, use-based federal application for the following mark (*see* **Exhibit 59**, TSDR status and title record):

i. **TRUSTAR BANK:** Application Serial No. 88/641,946 (published February 25, 2020) (Class 36: Banking and financing services; Banking services; Banking services featuring the provision of certificates of deposit; Checking account services; Mortgage lending; Savings account services; Savings bank services; Arranging of loans; ATM banking services; Commercial lending services; Consumer lending services; Credit and loan services; Financial services, namely, mortgage refinancing; Financial services, namely, wealth management services; Financial services, namely, money lending; Financing of loans; Mortgage banking; On-line banking services; Providing personal loans and lines of credit; Savings and loan services.

c. Trustar Bank also uses **TRUSTAR FREE CHECKING, TRUSTAR INTEREST CHECKING**, and **TRUSTAR TEEN CHECKING** for its checking account offerings (**Exhibit 60**, <https://www.trustarbank.com/personal-banking/personal-checking-accounts/>); **TRUSTAR SAVINGS, TRUSTAR MONEY MARKET, TRUSTAR MINOR SAVINGS, TRUSTAR CD**, and **TRUSTAR IRA** for savings account offerings (**Exhibit 61**,

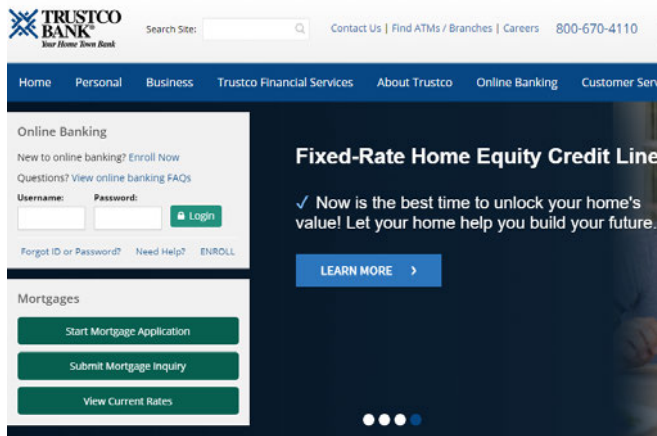
<https://www.trustarbank.com/personal-banking/personal-savings-accounts/>) and **TRUSTAR SMALL BUSINESS CHECKING, TRUSTAR BUSINESS INTEREST CHECKING, TRUSTAR BUSINESS CHECKING/ANALYSIS, TRUSTAR NON-PROFIT CHECKING, and TRUSTAR IOLTA/ATTORNEY TRUST ACCOUNT CHECKING** for business banking offerings (**Exhibit 62**, <https://www.trustarbank.com/personal-banking/personal-savings-accounts/>).

- d. Trustar Bank is headquartered in Great Falls, VA, with one branch in that city and a commercial lending office in McLean, VA. **Exhibit 63**, <https://www.trustarbank.com/greatfalls-branch/> and <https://www.trustarbank.com/tysons-branch/>. Plaintiff has approximately 170 members in Fairfax County, VA, where Trustar Bank's branch and commercial lending office are located. *See* Exhibit 14.

#### **50. Trustco Bank**

- a. True and correct copies of various webpages from Trustco Bank's website (located at <https://www.trustcobank.com>) are attached as **Exhibits 64**, and **66-68** and identify that:

- i. Trustco Bank is using the mark and logo shown below:



- b. Trustco Bank owns the following federal registrations for its TRU-prefix marks (*see* **Exhibit 65**, registration certificates and TSDR status and title records):

- i. **TRUSTCO:** Reg. No. 2,671,259 (Class 36: banking services, namely, checking account services, direct deposit services, electronic banking, automated teller machine services, savings, certificate of deposit and money market interest account services, residential and commercial mortgage loan services, home equity credit line and loan services and commercial loan services, auto and recreational loan services; personal loan services; professional and individual retirement account services; personal and corporate trust services; estate and financial planning services; executor and trust management services; investment management services and public and municipal funds depository services).
- ii. **TRUSTCO BANK:** Reg. No. 1,614,201 (Class 36: namely, checking account services, direct deposit services, electronic banking, namely, automated teller machine services, savings, certificate of deposit and money market interest account services, residential and commercial loan services, home equity credit line and loan services and commercial loan services; auto and recreational loan services; personal [and student loan services]; credit card services; professional and

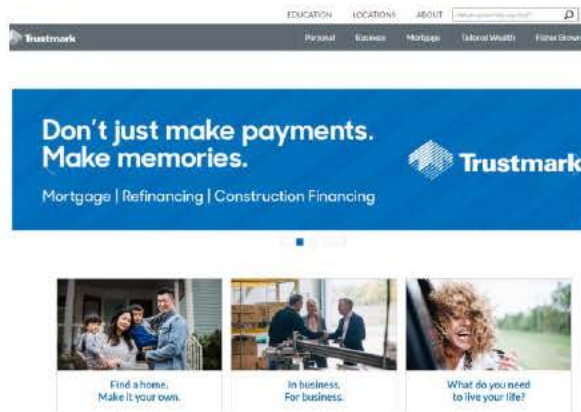
individual retirement account services; personal and corporate trust services; estate and financial planning services; executor and trust management services; investment management services).

- c. Trustco Bank also uses **TRUSTCO FINANCIAL SERVICES** for its wealth management and financial planning services. **Exhibit 66**, <https://www.trustcobank.com/page/trustco-financial-services-3.html>.
- d. Trustco Bank is headquartered in Glenville, New York, which is in Schenectady County, where Plaintiff has members. **Exhibit 67**, <https://www.trustcobank.com/page/we-are-trustco-bank-60.html>), *see* Exhibit 14. Trustco Bank has 88 branches in New York, 53 in Florida, 4 in Massachusetts, 2 in New Jersey, and 1 in Vermont (*see Id.* and **Exhibit 68**, <https://www.trustcobank.com/branch-and-atm-locator.php>), all of which are places Plaintiff has members. *See* Exhibit 14.

## 51. Trustmark National Bank




- a. True and correct copies of various webpages from Trustmark National Bank's website (located at <https://www.trustmark.com/>) are attached as **Exhibits 69, and 71-72** and identify that:
- i. Trustmark National Bank is using the mark and logo shown below:



- b. Trustmark National Bank owns several federal registrations for its TRU-prefix marks, such as (*see* **Exhibit 70**, registration certificates and TSDR status and title records):

Mark	Reg. No.	Services
TRUSTMARK	2,559,639	Class 36: Banking services, namely checking, savings and loan services, investment services, cash management and electronic banking; and financial

		services, namely, credit card services, financial planning, financial portfolio management, and trust and asset management; providing information in the financial and banking fields; and providing annuity brokerage services; all of the above services are performed via a global computer network.
<b>TRUSTMARK NATIONAL BANK &amp; Design</b> 	2,382,693	Class 36: Banking service, namely checking, savings and loan services, investment services, cash management and electronic banking; and financial services, namely credit card services, financial planning, financial portfolio management, and trust and asset management.
<b>TRUSTMARK BANK</b>	2,974,255	Class 36: Banking services, namely checking, savings and loan services, investment services, cash management and electronic banking; financial services, namely, credit card services, financial planning, financial consultation and investment advice, and financial portfolio management; trust and asset management; and providing annuity brokerage services related thereto.
<b>TRUSTMARK FINANCIAL SERVICES, INC.</b>	2,433,197	Class 36: Banking services, namely checking, savings and loan services, investment services, cash management and electronic banking; and financial services, namely, credit card services, financial planning, financial portfolio management, and trust and asset management, and providing annuity brokerage services.
<b>TRUSTMARK</b>	4,236,715	Class 36: Banking services, namely, checking, savings and loan services, investment services and trust and asset management; Online banking services;

		Cash management services; Electronic banking; Financial services, namely, credit card services, debit card services; financial planning, retirement planning financial consultation and investment advice, and financial portfolio management; providing annuity brokerage services; Mortgage banking services, namely, origination, acquisition, servicing, securitization and brokerage of mortgage loans, mortgage lending and mortgage re-financing.
<b>TRUSTTOUCHWEB</b>	2,684,559	Class 36: Banking services, namely checking, savings and loan services, investment services, cash management and electronic banking via the internet; financial services, namely, credit card services, financial planning, financial portfolio management, and trust and asset management via the internet; providing information in the financial and banking fields via the internet; insurance services, namely, annuity brokerage services via the internet.
<b>TRUSTMARK INVESTMENT ADVISORS</b>	2,931,154	Class 36: Financial services in the nature of financial consultation and investment advice.
<b>TRUSTMARK BANKING AND FINANCIAL SOLUTIONS</b>	2,880,332	Class 36: Banking services, namely, checking, savings and loan services, investment services, cash management and electronic banking; financial services, namely, credit card services, financial planning, financial portfolio management, and trust and asset management; and providing annuity brokerage services related thereto.
<b>TRUSTMARK MORTGAGE SERVICES</b>	2,985,273	Class 36: Banking and financial services, namely, mortgage lending, mortgage banking, and mortgage brokering,

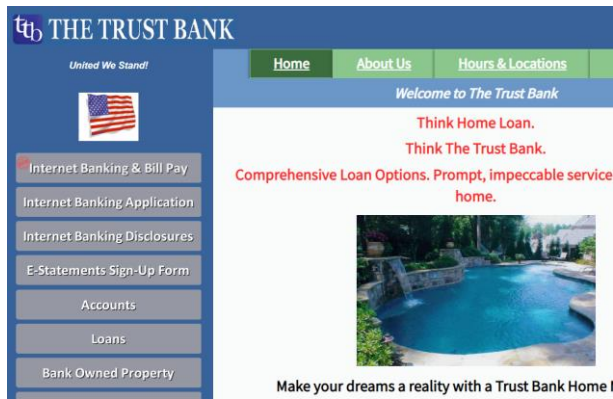
		namely, the receipt of mortgage payments, customer service relating to mortgage services, escrow administration of mortgages, mortgage investor accounting, mortgage collections and foreclosures, purchases and sales of mortgage backed securities, private and public sales of mortgage loans and mortgage loan portfolios, servicing of mortgage loan portfolios, and brokering of mortgaging loan servicing rights.
<b>TRUSTMARK SECURITIES</b>	2,928,349	Class 36: Investment services; financial services, namely, financial planning, financial consultation and investment advice, and financial portfolio management; trust and asset management; and providing annuity brokerage services related thereto.
<b>TRUSTMARK WEALTH MANAGEMENT</b>	2,928,350	Class 36: Banking services, namely checking, savings and loan services, investment services, cash management and electronic banking; financial services, namely, credit card services, financial planning, financial consultation and investment advice, and financial portfolio management; trust and asset management; and providing annuity brokerage services related thereto.
<b>TRUSTMARK TAILORED WEALTH</b>	5,950,918	Class 36: Banking services, namely, checking account services, savings and loan services, investment banking services, cash management and electronic banking via a global computer network; financial services, namely, financial planning, financial consultation and investment advice, and financial portfolio management; estate trust management and financial asset management; and brokerage in the field of annuities.

<b>myTrustmark</b>	4,783,479	Class 36: Online banking services.
<b>myTrustmarkMortgage</b>	5,808,066	Class 36: Online banking and financial services, namely, mortgage lending, mortgage banking and mortgage banking services, maintaining escrow accounts for mortgages, debt collection and mortgage foreclosure services, purchase of residential mortgages on behalf of others and the issuance of mortgage-backed securities, mortgage banking services being the origination, acquisition, servicing, securitization and brokerage of mortgage loans.

- c. Trustmark Bank is headquartered in Jackson, Mississippi, which is located in Hinds County, where Plaintiff has members. **Exhibit 71**, <https://www.trustmark.com/about-us/locations>; *see* Exhibit 14. Trustmark Bank has a total of 216 branches, including 190 in Mississippi, 65 in Alabama, 27 in Florida, 19 in Tennessee, and 15 in Texas (Exhibit 71), all of which are places Plaintiff has members. *See* Exhibit 14.

## 52. The Trust Bank

- a. True and correct copies of various webpages from The Trust Bank's website (located at <https://www.thetrustbank.net>) are attached as **Exhibits 72-73** and identify that:
- i. The Trust Bank is using the mark and logo shown below:

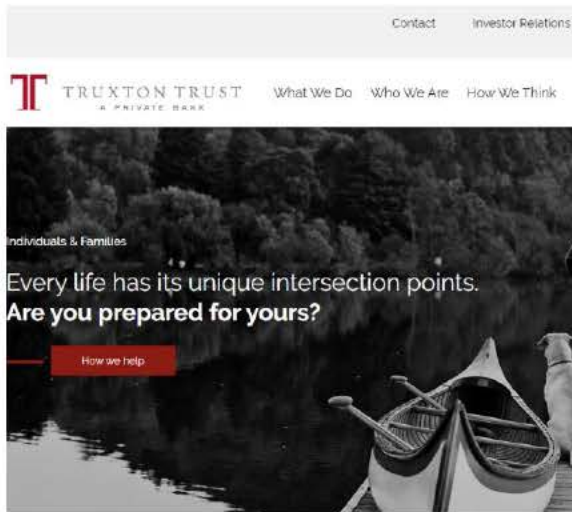


- ii. The Trust Bank is headquartered in Lenox, GA, with three branches (in Lenox, Adel, and Moultrie) and a mortgage office in Valdosta, Georgia. **Exhibit 73**, <https://www.thetrustbank.net/hours-locations/>. Plaintiff has members located in Colquitt and Lowndes counties, where those facilities are located. *See* Exhibit 14.

### 53. Truxton Trust

- a. True and correct copies of various webpages from Truxton Trust's website (located at <https://www.truxtontrust.com/>) are attached as **Exhibits 74 and 76** and identify that:
- i. Truxton Trust is using the mark and logo shown below:





b. Truxton Trust owns the following federal registrations for its TRU-prefix marks (*see Exhibit 75*, registration certificates and TSDR status and title records):

i. **TRUXTON TRUST**: Reg. No. 4,548,754 (Class 36: Banking services; financial management services).



ii. : Reg. No. 4,548,755 (Class 36: Banking services; financial management services).

- c. Truxton Trust has one office in Nashville, TN (*see* **Exhibit 76**, <https://www.truxtontrust.com/contact-us/>), which is in Davidson County, Tennessee, where Plaintiff has members. *See* Exhibit 14. Truxton Trust also has an office in Athens, GA, which is in Clarke County, where Plaintiff has members. *Id.*

#### 54. TruWest Credit Union

- a. True and correct copies of various webpages from TruWest Credit Union's website (located at <https://truwest.org/>) and Facebook page (located at <https://www.facebook.com/TruWestCreditUnion/photos/a.223225544404409/2296804520379824/?type=3&theater>) are attached as **Exhibits 77** and **79-80** and identify that:
- i. TruWest Credit Union is using the mark and logo shown below:





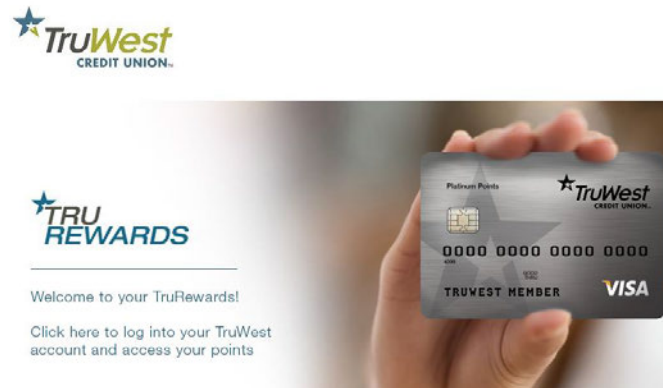
b. TruWest Credit Union owns the following federal trademark registrations for its TRU-prefix marks (*see Exhibit 78*, registration certificates and TSDR status and title records):

i. **TRUWEST**: Reg. No. 2,867,852 (Class 36: credit union services)



ii. : Reg. No. 4,695,589 (Class 36: credit union services)

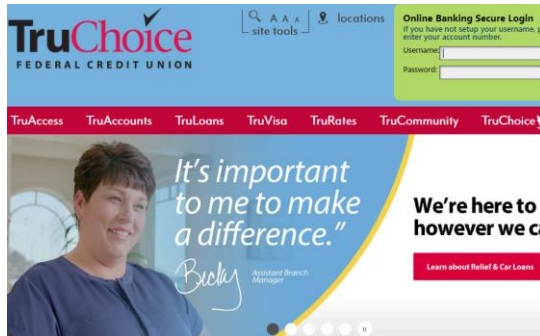
- c. TruWest Credit Union also uses the marks **TRUDIFFERENCES** for its banking services, and **TRUREWARDS** for its credit card rewards program (**Exhibit 79**, <https://truwest.org/accounts/cards/trurewards/>):



- d. TruWest Credit Union is headquartered in Phoenix, AZ, with 10 branches in Arizona and four branches in Texas. **Exhibit 80**, <https://truwest.org/contact/#panel-1>.
- e. TruWest Credit Union participates in the CO-OP Shared Branch network and ATM network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at any of TruWest Credit Union's branches and ATMs. Similarly, members of TruWest Credit Union may conduct banking transactions at Truliant Federal Credit Union's branches.

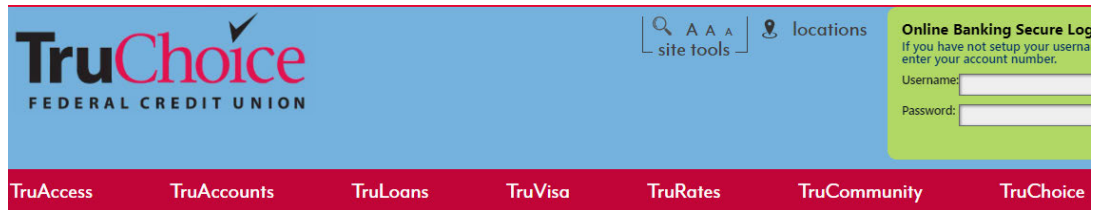
## 55. TruChoice Federal Credit Union

- a. True and correct copies of various webpages from TruChoice Federal Credit Union's website (located at <https://www.trufcu.com>) and its Facebook page (located at <https://www.facebook.com/TruChoiceFCU/photos/a.258452234280203/2401013780024027/?type=3&theater>) are attached as **Exhibits 81-82** and identify that:
- i. TruChoice Federal Credit Union is using the mark and logo shown below:



- ii. The credit union also uses various TRU-prefix marks for its banking services, credit cards, loans, and related services, including: **TRUACCESS, TRUACCOUNTS, TRULOANS,**

**TRUVISA, TRURATES, TRUHERO, and TRUCOMMUNITY**, as shown below and in Exhibit 81.



- iii. TruChoice Federal Credit Union is headquartered in Portland, ME, with three branches in Portland. **Exhibit 82**, <https://www.trufcu.com/truchoice/atms-locations-hours>.

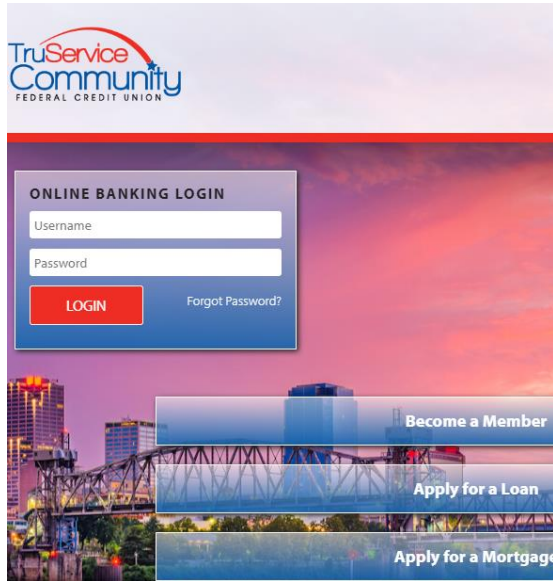
Plaintiff has members in Cumberland County, where Portland is located. *See* Exhibit 14.

- b. TruChoice Federal Credit Union participates in the CO-OP Shared Branch network and ATM network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at any of TruChoice Federal Credit Union's branches and ATMs. Similarly, members of TruChoice Federal Credit Union may conduct banking transactions at Truliant Federal Credit Union's branches.

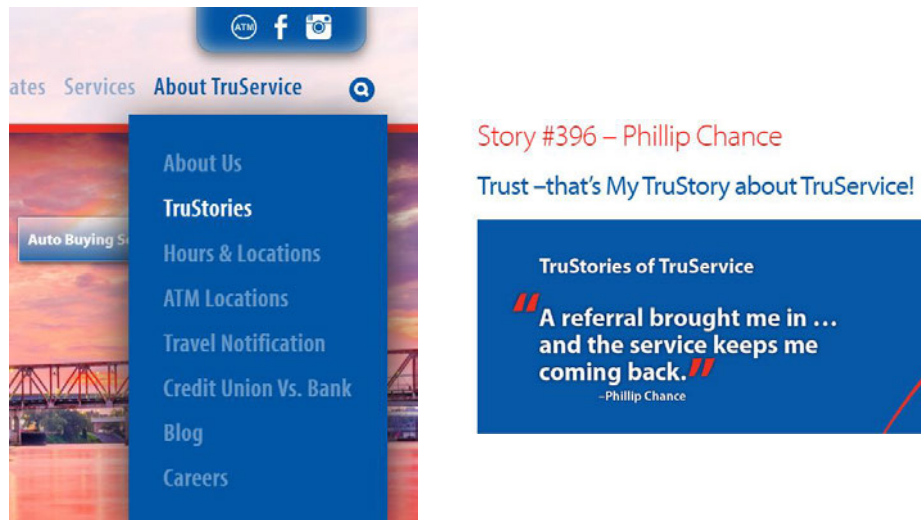
**56. TruService Community Federal Credit Union**

- a. True and correct copies of various webpages from TruService Community Federal Credit Union's website (located at <https://www.truservice.net/>) are attached as **Exhibits 83-85** and identify that:

- i. TruService Community Federal Credit Union is using the mark and logo shown below:



- ii. TruService Community Federal Credit Union also uses **TRUSTORY** and **TRUSTORIES** in offering its banking services, as shown below:



- b. The credit union is headquartered in Little Rock, AR, with additional branches in North Little Rock, AR, and Conway, AR. **Exhibit 84**, <https://www.truservice.net/contact-us>. Plaintiff has members in Pulaski County and Faulkner County, where TruService Federal Credit Union’s facilities are located. *See* Exhibit 14.
- c. TruService Community Federal Credit Union participates in the CO-OP Shared Branch network and ATM network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at any of TruService Community Federal Credit Union’s branches and ATMs. Similarly, members of TruService Community Federal Credit Union may conduct banking transactions at Truliant Federal Credit Union’s branches.

- d. TruService Community Federal Credit Union offers insurance services through third-party TruStage Insurance, as shown in **Exhibit 85** (<https://www.truservice.net/insurance-services>).
- e. Persons who search Plaintiff's website and mobile application for locations of CO-OP financial institutions will be shown listings for TruService Community Federal Credit Union, as shown below in search results that I obtained from doing so.



Make an appointment online when and where it's most convenient for you!

[Schedule an Appointment](#)

See below to find locations in:

[North Carolina](#) | [South Carolina](#) | [Virginia](#)

**Locate**

Enter a location:  
Little Rock, AR, USA **Go**

**Find Me**

Search by all that apply:

- ☐ TruService Community FCU Branches
- ☒ Surcharge-Free ATMs
- ☒ Deposit Taking ATMs
- ☒ CO-OP Shared Branch

**Results**

Additional Details:  
Surcharge-Free

**TruService Community FCU**  
4700 E. McCain Blvd  
North Little Rock, AR 72117  
5.25 miles  
Send To: [Email](#) | [Mobile](#)  
[Get Directions](#)

Additional Details:  
Deposit Taking  
Surcharge-Free  
Surcharge-Free: YES  
Operating Hours: 24 Hours  
ATM Type: Full Service/Dep  
Location: Walk Up

**TruService Community FCU**  
4700 E. McCain Blvd  
Little Rock, AR 72231  
5.37 miles  
Send To: [Email](#) | [Mobile](#)  
[Get Directions](#)

Additional Details:

**Map** **Satellite**

Address Details

**TruService Community FCU**  
4700 E. McCain Blvd  
North Little Rock, AR 72117  
5.25 miles

CUHERE

Directions (Address, City, or Zip Code):  
Little Rock, AR, USA **Go**

Map data ©2020 Google Terms of Use Report a map error

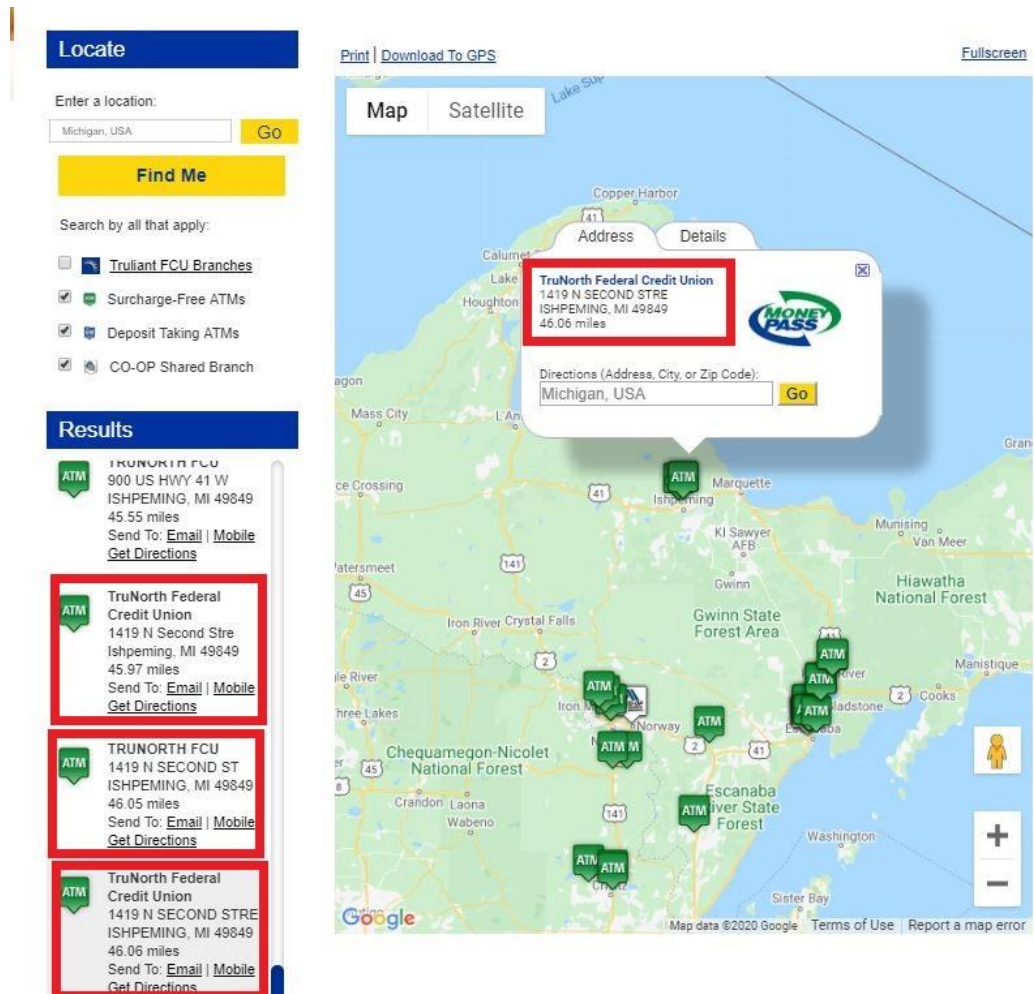
## 57. TruNorth Federal Credit Union

- a. True and correct copies of various webpages from TruNorth Federal Credit Union's website (located at <https://www.trunorthcu.org>) attached as **Exhibits 86-89** and identify that:

- i. TruNorth Federal Credit Union is using the mark and logo shown below:



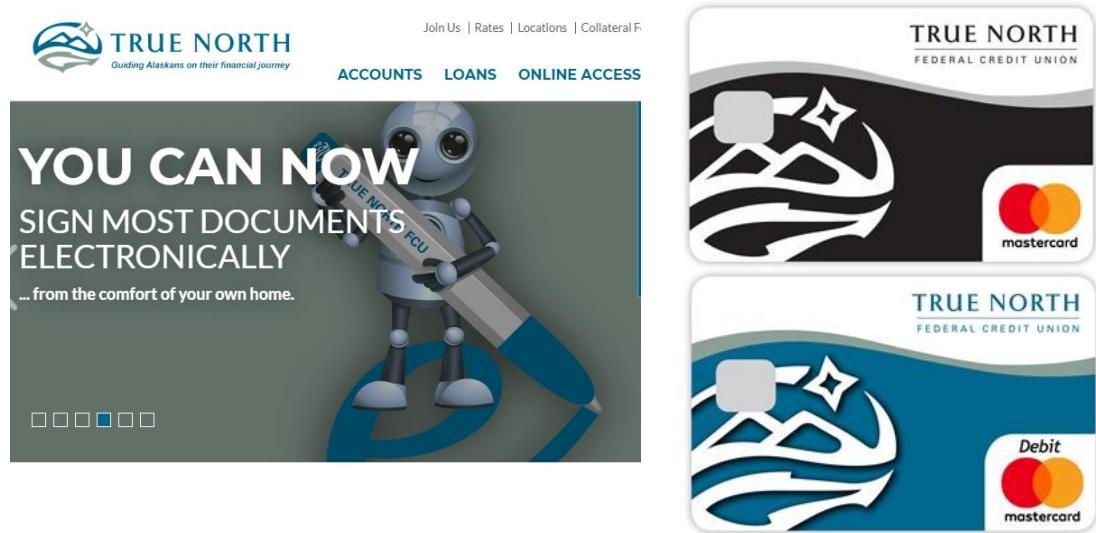
- b. TruNorth Federal Credit Union is headquartered in Ishpeming, MI, with three branches in Michigan. **Exhibit 87**, <http://elegantseagullsdev.com/client/trunorth/locations-hours/>.
- c. Persons who search Plaintiff's website and mobile application for locations of CO-OP financial institutions will be shown listings for TruNorth Federal Credit Union, as shown below in search results that I obtained from doing so.



## 58. True North Federal Credit Union

- a. True and correct copies of various webpages from True North Federal Credit Union's website (located at **Error! Hyperlink reference not valid.**<https://www.truenorthfcu.org/>) are attached as **Exhibits 88-89** and identify that:

- i. True North Federal Credit Union is using the mark and logo shown below:



- ii. True North Federal Credit Union is headquartered in Juneau, AK, with one branch in Anchorage and two branches in Juneau. **Exhibit 89**, <https://www.truenorthfcu.org/about-us/locations>. Plaintiff has members in Anchorage and Juneau. *See* Exhibit 14.

- b. True North Federal Credit Union participates in the CO-OP Shared Branch network and ATM network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking

transactions at any of True North Federal Credit Union's branches and ATMs. Similarly, members of True North Federal Credit Union may conduct banking transactions at Truliant Federal Credit Union's branches.

**59. TruMark Financial Credit Union**

- a. True and correct copies of various webpages from TruMark Financial Credit Union's website (located at <https://www.trumarkonline.org/>) are attached as **Exhibits 90**, and **92-93** and identify that:
  - i. TruMark Financial Credit Union is using the mark and logo shown below:



b. TruMark Financial Credit Union owns the following federal trademark registrations for its TRU-prefix marks (*see Exhibit 91*, registration certificates and TSDR status and title records):

i. **TRUMARK FINANCIAL**: Reg. No. 3,082,473 (Class 36: credit union services)

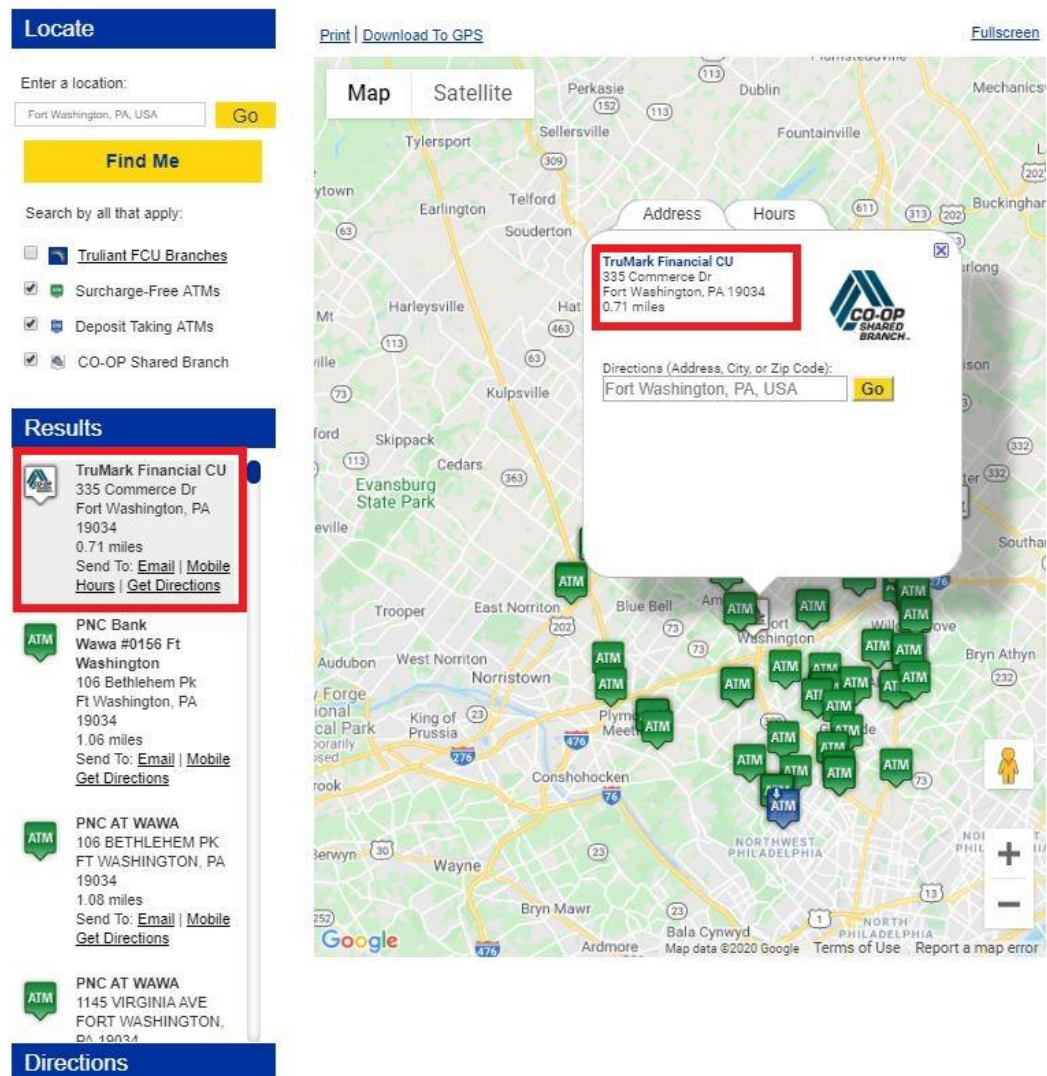


ii. : Reg. No. 3,241,971 (Class 36: credit union services)



- c. TruMark Financial Credit Union is headquartered in Fort Washington, PA, with 26 additional branches throughout Pennsylvania. **Exhibit 92**, <https://www.trumarkonline.org/connect/find-a-branch>. Plaintiff has members in Montgomery County, Philadelphia County, Bucks County, Delaware County, and Chester County, Pennsylvania, where TruMark Financial Credit Union is headquartered and maintains branches. *See* Exhibit 14.
- d. TruMark Financial Credit Union participates in the CO-OP Shared Branch network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at any of TruMark Financial Credit Union's branches. Similarly, members of TruMark Financial Credit Union may conduct banking transactions at Truliant Federal Credit Union's branches.
- e. TruMark Financial Credit Union offers insurance services through third-party TruStage Insurance, as shown in **Exhibit 93** (<https://www.trumarkonline.org/protect/>; <https://www.trumarkonline.org/protect/auto-insurance/>; <https://www.trumarkonline.org/protect/life-insurance-plans/>).

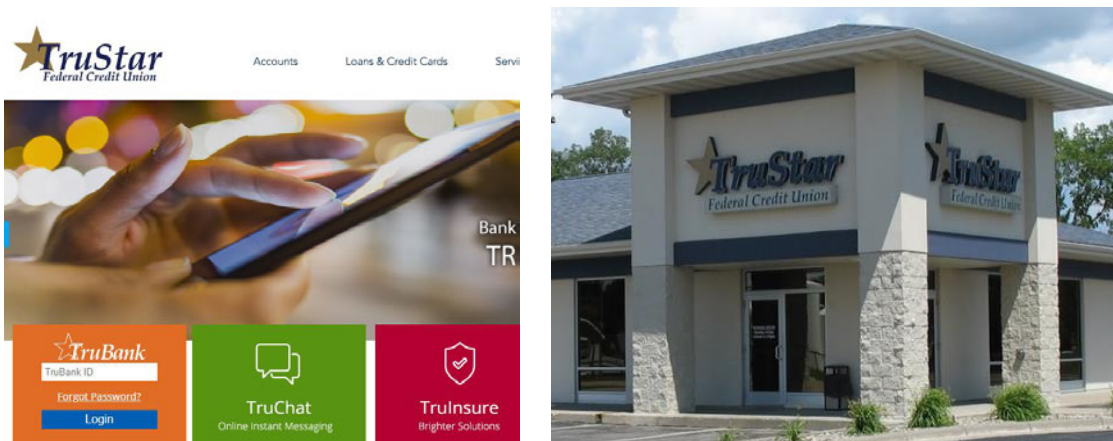
- f. Persons who search Plaintiff's website and mobile application for locations of CO-OP financial institutions will be shown listings for TruMark Financial Credit Union, as shown below in search results that I obtained from doing so.





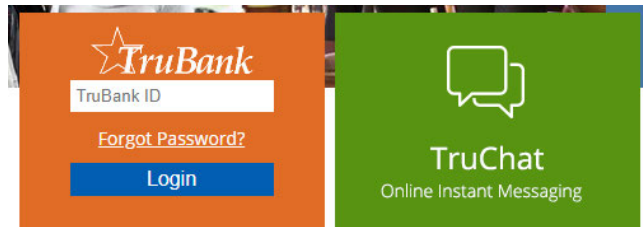
## 60. TruStar Federal Credit Union

- a. True and correct copies of various webpages from TruStar Federal Credit Union's website (located at <https://www.trustarfcu.com>) are attached as **Exhibits 94-97** and identify that:
- i. TruStar Federal Credit Union is using the mark and logo shown below:



- ii. As shown in **Exhibit 95** (<https://www.trustarfcu.com/trubank>; <https://www.trustarfcu.com/trupay>; <https://www.trustarfcu.com/checking>) and below, TruStar Federal Credit Union also uses **TRUBANK**, **TRUPAY**,

**TRUCHAT**, and **TRUCHECKING** to offer its online banking services:



## TruBank

- AAAA +

### Access your accounts from any computer

Our enhanced online banking platform allows you to customize your screen, set up a wide variety of account alerts, and access financial management tools. To get started, click [here](#).

- FREE to all members
- Review your accounts
- Transfer funds
- Pay bills with TruPay
- View statements

## TruChecking

*A great option for members who like to bank electronically*

- No minimum balance
- Free first order of checks
- No monthly maintenance fee with eStatements

## TruPay

- AAAA +

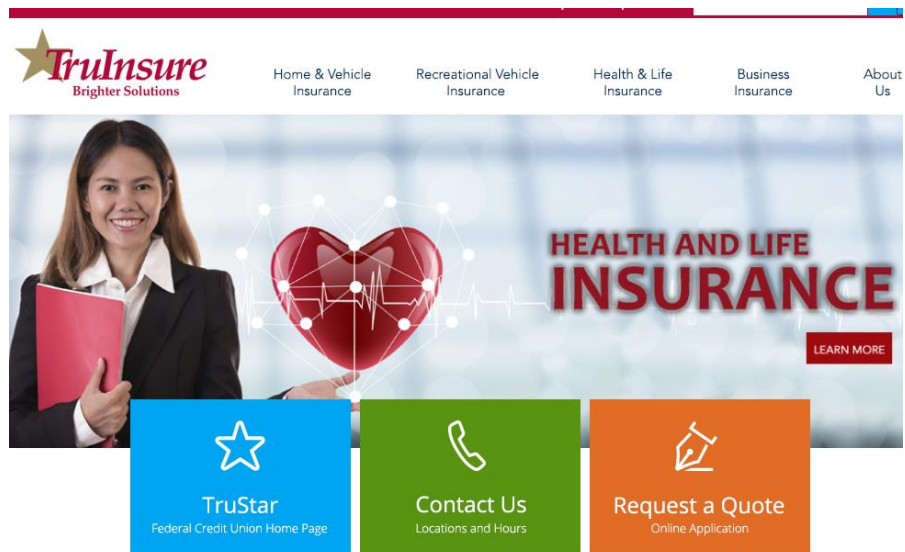
### Our FREE Online Bill Payment Service

Available through online banking and our mobile app, with TruPay you can:

- Pay bills electronically – save money on stamps and envelopes
- Make multiple payments from one screen
- Schedule payments in advance
- Access and print copies of checks with the click of a button
- Customize your display screen and your paid bill history
- Group your bills by date

With a [checking account](#), you can sign up for the convenience of TruPay online! [Log in](#) and click the TruPay tab at the top for step-by-step directions, or call or visit one of our [TruStar locations](#).

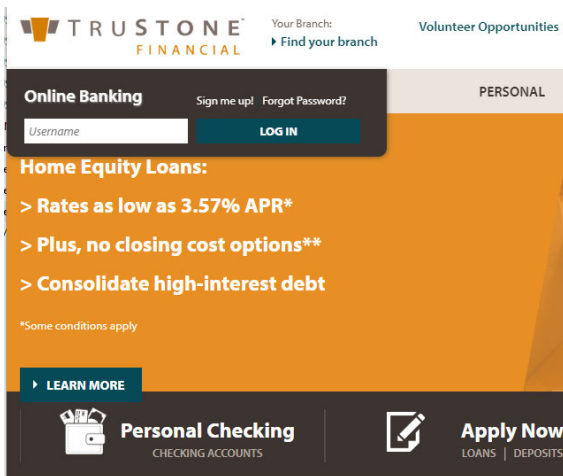
- iii. TruStar Federal Credit Union also uses **TRUINSURE** to offer insurance services at its website located at [trueinsure.com](https://www.trueinsure.com), as shown below (**Exhibit 96**, <https://www.trueinsure.com/>):



- b. TruStar Federal Credit Union is headquartered in International Falls, Minnesota, with six branches in Minnesota (International Falls, Littlefork, Bemidji, Nevis, Park Rapids, and Menahga). **Exhibit 97**, <https://www.trustarfcu.com/location-and-atms>. Plaintiff has members located in Minnesota. *See* Exhibit 14.

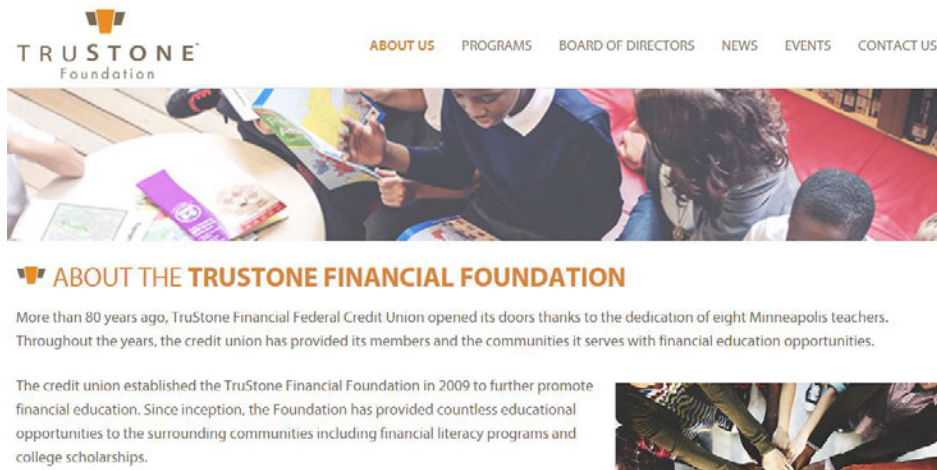
#### 61. TruStone Financial Federal Credit Union

- a. True and correct copies of various webpages from TruStone Financial Credit Union's website (located at <https://trustonefinancial.org/>) are attached as **Exhibits 98** and **100-102** and identify that:
- i. TruStone Financial Federal Credit Union is using the mark and logo shown below:



- b. TruStone Financial Credit Union owns the following federal trademark registrations for its TRU-prefix marks (*see Exhibit 99*, registration certificates and TSDR status and title records):
  - i. **TRU STONE**: Reg. No. 3,797,088 (Class 36: credit union services)
  - ii. **TRUSTONE FINANCIAL**: Reg. No. 5,295,173 (Class 36: credit union services)
- c. TruStone Financial Credit Union also uses **TRUSTONE FINANCIAL FOUNDATION** and **TRUSTONE FOUNDATION** for its charitable foundation that provides financial education to its

members and local communities, including scholarships and financial literacy programs, as shown below in a screenshot of its website located at website using *trustonefoundation.org*:



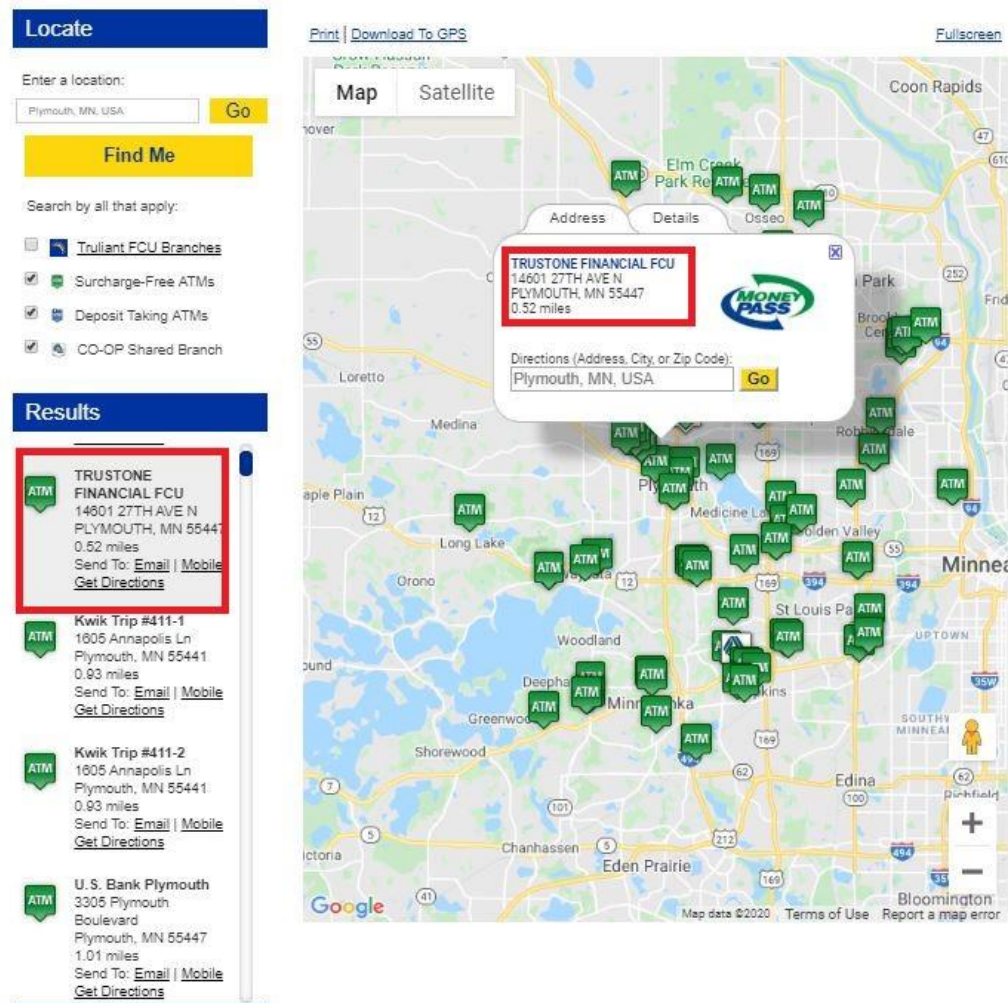
- d. TruStone Financial Credit Union is headquartered in Plymouth, MN, with 11 branches in Minnesota (Golden Valley, Burnsville, St. Paul, Minneapolis, Maple Grove, Oakdale, Plymouth, Rogers, Roseville, St. Cloud) and four branches in Wisconsin (Kenosha, Greenfield, Cudahy). **Exhibit 100**, <https://trustonefinancial.org/atm-branch-finder>. Plaintiff has members in the Minnesota counties of Hennepin, Dakota, Ramsey, Washington, and Stearns, where TruStone Financial Credit Union's branches are located. *See* Exhibit 14. Plaintiff also

has members in the Wisconsin counties of Kenosha and Milwaukee where TruStone Financial Credit Union's branches are located. *Id.*

- e. Persons eligible to join TruStone Financial Credit Union include, among other persons, anyone who makes a \$10 donation to the TruStone Foundation. Exhibit 101, <https://trustonefinancial.org/membership/become-a-member/membership-eligibility/>.
- f. TruStone Financial Credit Union participates in the CO-OP ATM network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at any of TruStone Financial Credit Union's ATMs, without a fee. Similarly, members of TruStone Financial Credit Union may conduct banking transactions at Truliant Federal Credit Union's branches.
- g. TruStone Financial Credit Union offers insurance services through the third-party TruStage Insurance, as shown in **Exhibit 102** (<https://trustonefinancial.org/membership/member-benefits/insurance-products/>).



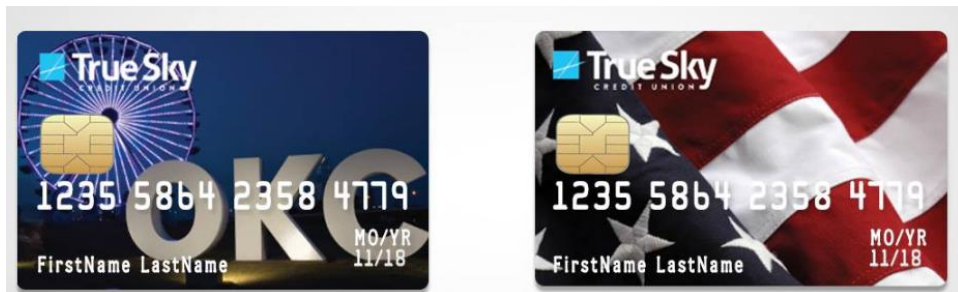
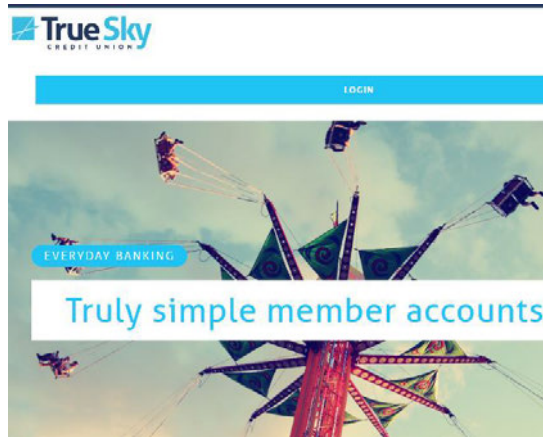
- h. Persons who search Plaintiff's website and mobile application for locations of CO-OP financial institutions will be shown listings for TruStone Financial Credit Union, as shown below in search results that I obtained from doing so.



## 62. True Sky Credit Union



- a. True and correct copies of various webpages from True Sky Credit Union's website (located at <https://www.trueskycu.org>) are attached as **Exhibits 103** and **105** and identify that:
- i. True Sky Credit Union is using the mark and logo shown below:

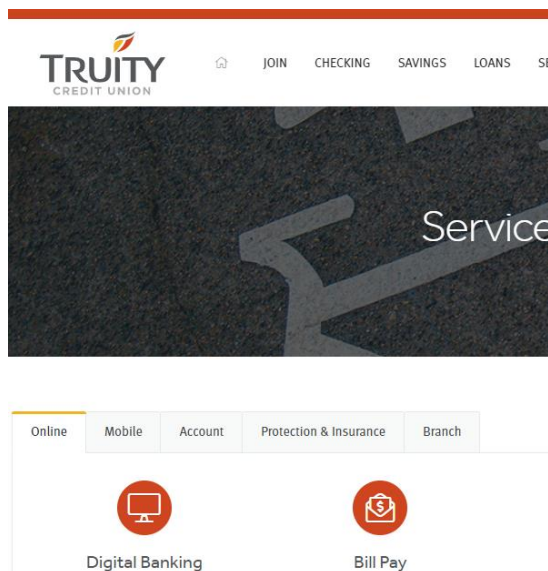


- b. True Sky Credit Union owns the following federal registration for its TRU-prefix mark (*see* **Exhibit 104**, registration certificate and TSDR status and title record):
  - i. **TRUE SKY FEDERAL CREDIT UNION:** (Reg. No. 5,188,090) (Class 36: Banking services; online banking services; credit union services; online credit union services)
- c. True Sky Credit Union is headquartered in Oklahoma City, Oklahoma, with nine branches in Oklahoma (Oklahoma City, Edmond, Moore, Mustang, Norman, Yukon). **Exhibit 105**, <https://www.trueskycu.org/about-us/branch-locations>. Plaintiff has members in the Oklahoma counties of Oklahoma, Cleveland, and Canadian County, where True Sky Credit Union's branches are located. *See* Exhibit 14.
- d. True Sky Credit Union participates in the CO-OP Shared Branch network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at any of True Sky Credit Union's branches. Similarly, members of True Sky Credit Union may conduct banking transactions at Truliant Federal Credit Union's branches.

### 63. Truity Credit Union


- a. True and correct copies of various webpages from Truity Credit Union's website (located at <https://www.truitycu.org>) attached as **Exhibits 106** and **108-109** and identify that:

- i. Truity Credit Union is using the mark and logo shown below:

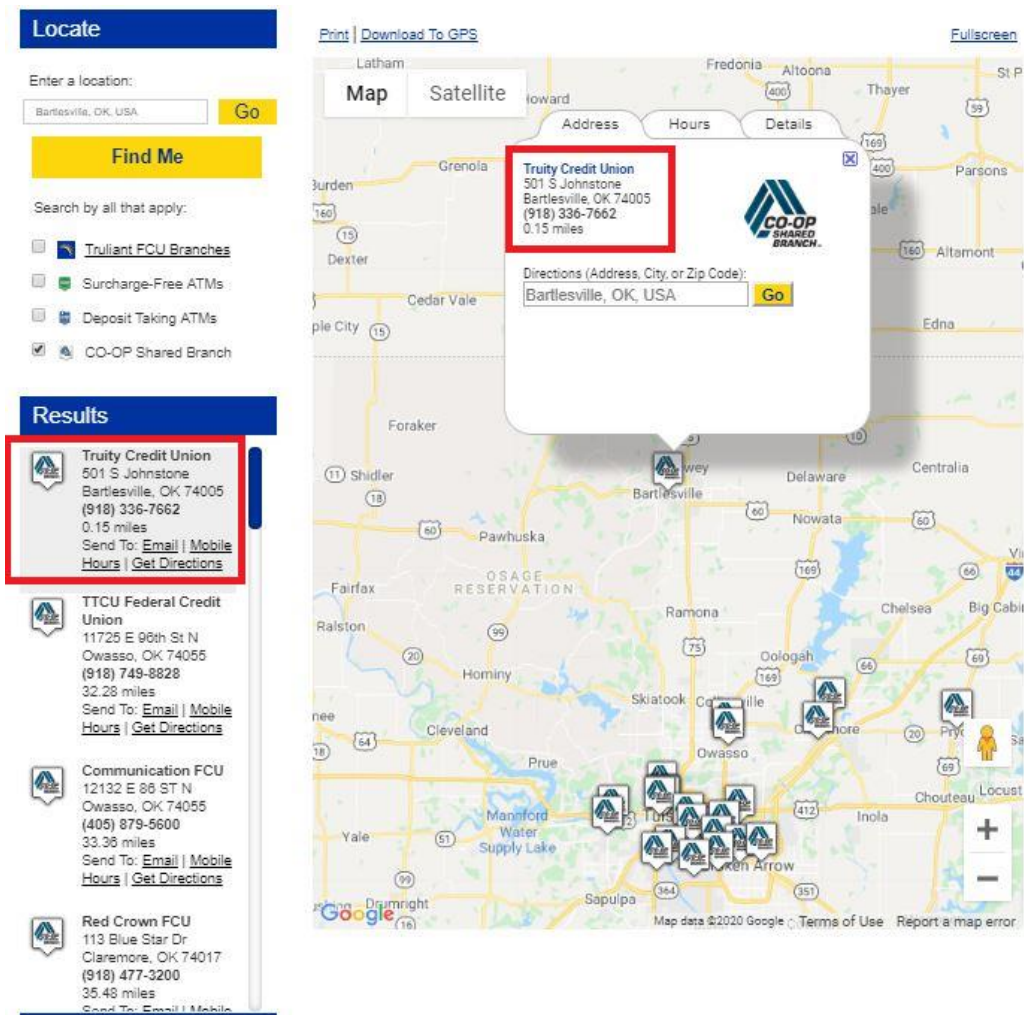


- b. Truity Credit Union owns the following federal registrations for its TRU-prefix marks (*see Exhibit 107*, registration certificates and TSDR status and title records):



- i.  : Reg. No. 4,504,824 (Class 36: credit union services)
- ii. **TRUITY EDUCATION FOUNDATION:** Reg. No. 4,545,201 (Class 36: charitable foundation services, namely, providing financial support to public school foundations for enhancement of educational programs)
- c. Truity Federal Credit Union is headquartered in Bartlesville, Oklahoma, with four branches in Bartlesville, two branches in Lawrence, Kansas, and one branch in Springdale, Arkansas. **Exhibit 108**, <https://www.truitycu.org/locations>. Plaintiff has members located in Washington County, Oklahoma; Douglas County, Kansas; Washington County, Arkansas; and Benton County, Arkansas, where Truity Federal Credit Union's branches are located. *See Exhibit 14.*

- d. Persons eligible to join Truity Credit Union include, among other persons, anyone who joins the Truity Education Foundation (\$25 membership fee, \$10 annual dues). **Exhibit 109**, <https://www.truitycu.org/join#OAK>.
- e. Truity Credit Union participates in the CO-OP Shared Branch network. *See* Exhibit 24. Therefore, Truliant Federal Credit Union members may conduct banking transactions at any of Truity Credit Union's branches. Similarly, members of Truity Credit Union may conduct banking transactions at Truliant Federal Credit Union's branches.
- f. Persons who search Plaintiff's website and mobile application for locations of CO-OP financial institutions will be shown listings for Truity Credit Union, as shown below in search results that I obtained from doing so.

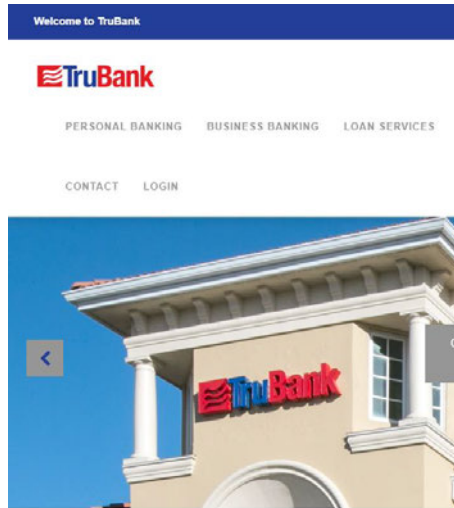


## 64. TruBank

- a. True and correct copies of various webpages from TruBank's website (located at <https://www.trubank.bank>) are attached as **Exhibits 110** and **112** and identify that:



- i. TruBank is using the mark and logo shown below:



- b. TruBank owns the following federal registrations for its TRU-prefix marks (*see Exhibit 111*, registration certificates and TSDR status and title records):

- i. **TruBank:** Reg. No. 4,454,604 (Class 36: banking and financial services, namely, checking, savings and certificate of deposit services; installment, agricultural, commercial and residential real estate lending; airplane financing; brokerage, investment and financial consulting services; and internet banking services)



ii. , Reg. No. 4,455,121 (Class 36: banking and financial services, namely, checking, savings and certificate of deposit services; installment, agricultural, commercial and residential real estate lending; airplane financing; brokerage, investment and financial consulting services; and internet banking services)

c. TruBank is headquartered in Indianola, IA, with eight branches in Iowa (Indianola, Oskaloosa, West Des Moines, Newton, Norwalk, Des Moines, What Cheer). Exhibit 112, <https://trubank.bank/contact>. Plaintiff has members in the Iowa counties of Warren, Polk, Dallas, and Jasper where Trubank's branches are located. *See* Exhibit 14.

#### 65. TrustBank

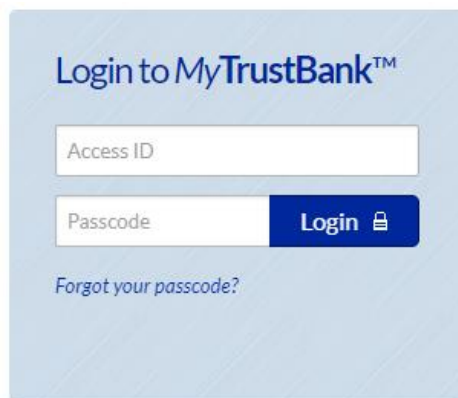
a. True and correct copies of various webpages from TrustBank's website (located at <https://trustbank.net>) are attached as **Exhibits 113-114** and identify that:

i. TrustBank is using the mark and logo shown below:





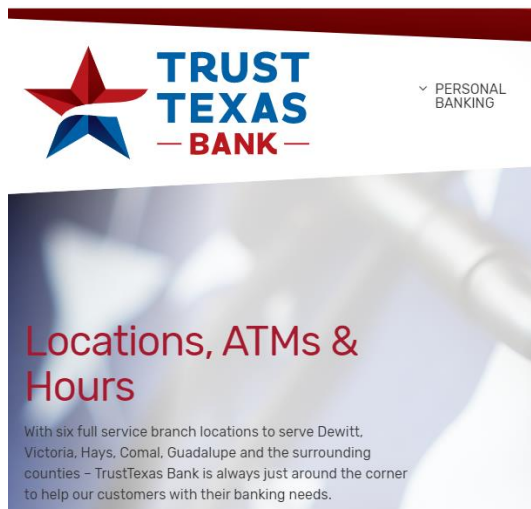
- ii. TrustBank also uses **MYTRUSTBANK** for its online banking services, as shown below (*Id.*):



- b. TrustBank is headquartered in Olney, IL. **Exhibit 114**, <https://trustbank.net/locations>. It serves Southeastern Illinois and Maricopa County in Arizona, with seven branches in Illinois (Olney, Cisne) and four in Arizona (Phoenix, Mesa, Chandler). *Id.* Plaintiff has members in Maricopa County, Arizona, where TrustBank's Arizona branches are located. *See* Exhibit 14.

#### 66. TrustTexas Bank

- a. True and correct copies of various webpages from TrustTexas Bank's website (located at <https://www.trusttexasbank.com>) are attached as **Exhibits 115** and **117** and identify that:
- i. TrustTexas Bank is using the mark and logo shown below:



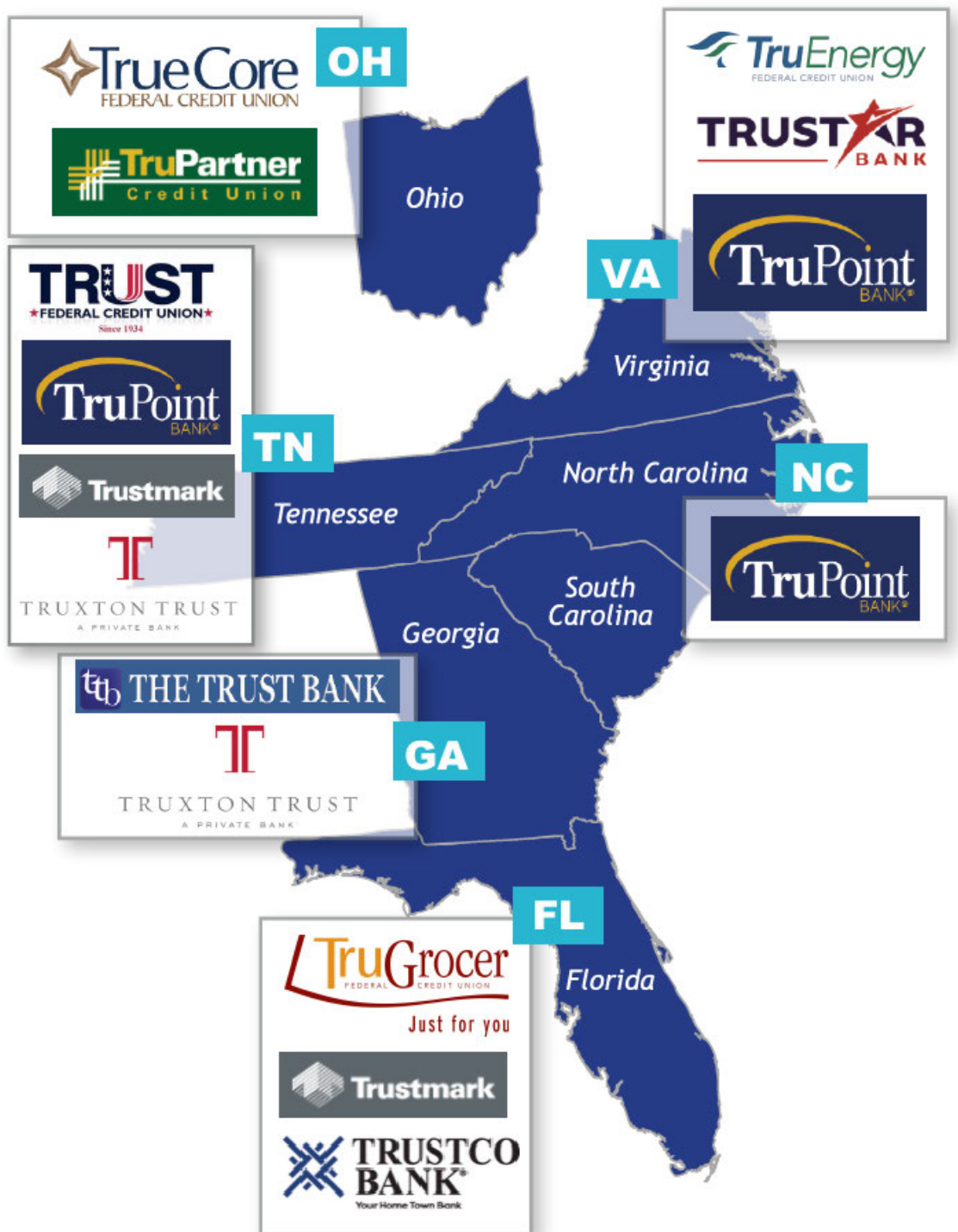
- b. TrustTexas Bank owns the following federal registrations for its TRU-prefix marks (*see* **Exhibit 116**, registration certificates and TSDR status and title records):
  - i. **TRUSTTEXAS**: Reg. No. 3,266,288 (Class 36: Financial services, namely banking services, financing services, financial consultation, and financial management).
  - ii. **TRUSTTEXAS BANK**: Reg. No. 3,266,289 (Class 36: Financial services, namely banking services, financing services, financial consultation, and financial management).
- c. TrustTexas Bank is headquartered in Cuero, TX, with six branches in the counties of DeWitt, Victoria, Hays, Comal, and Guadalupe. *Exhibit 117*, <https://www.trusttexasbank.com/Locations.aspx>. Plaintiff has members located in those counties where TrustTexas Bank has branches. *See* *Exhibit 14*.

## **VI. Geographic Overlap Of Truliant Federal Credit Union And Third Party TRU-Prefix Financial Institutions**

67. Plaintiff's website promotes that it offers mortgage loans in seven states- Ohio, Florida, Tennessee, Georgia, Virginia, North Carolina, and South Carolina. *See* *Exhibit 12*. Accordingly, Plaintiff's mortgage business

overlaps with other, previously described, third-party TRU financial institutions in the following states, as shown in the map below:

- a. **Ohio** (TruPartner and TrueCore credit unions);
- b. **Florida** (Trustco and Trustmark banks);
- c. **Tennessee** (Trustmark, Truxton Trust, and Trust Federal Credit Union);
- d. **Georgia** (Trust Bank and Truxton Trust);
- e. **Virginia** (TruPoint and Trustar banks, and TruEnergy Federal Credit Union); and
- f. **North Carolina** (TruPoint Bank and Trust Federal Credit Union).



68. Based on the information available at the website for each of the 24 TRU-prefix credit unions and banks identified in paragraphs above, the following institutions make membership available in a geographic field far outside of where they have branches:

- a. **TruGrocer Federal Credit Union:** membership is available to: i) employees who work regularly in the grocery and supermarket industry, ii) retirees of the grocery and supermarket industry, iii) an employee's or retiree's immediate family members, and iv) family members of a current TruGrocer member, *anywhere in the United States (see Exhibit 40)*.
- b. **TruEnergy Federal Credit Union:** persons eligible to join include, among other persons, employees of multiple partner employers located outside of the Springfield, Virginia area where TruEnergy has its one branch, including employers located in:
  - i. **North Carolina:** Charlotte, Raleigh, Wilmington (*see supra*, ¶ 24; and
  - ii. **Virginia:** Richmond, Woodbridge, Chesapeake, Alexandria, Falmouth, Ruckersville, Manassas, Fairfax (*see supra*, ¶ 24).

- c. **TruStone Financial Credit Union:** persons eligible to join include, among other persons:
- i. Persons located anywhere in the U.S. who make a minimum \$10 donation to the TruStone Foundation (*see supra* ¶ 42(e); Exhibit 101);
  - ii. Persons located anywhere in the U.S. who join the Maple Grover Historical Preservation Society and Museum (\$15 annual membership fee. (*See* Exhibit 101; **Exhibit 118**, membership webpage of Maple Grover Historical Preservation Society's website, located at <http://www.maplegrovernhistory.org/memberships.html>); and
  - iii. Employees of these companies with multiple locations throughout the U.S.: Huntington Learning Centers, Chrysler Corporation, Fluidyne Corporation, Motivation, ServiceMaster Clean, Owens Corning, and Sir Speedy Printing and Marketing Services. *See* Exhibit 101.

- d. **Truity Credit Union:** persons eligible to join include, among other persons, persons located anywhere in the U.S. who join the Truity Education Foundation (\$25 membership fee, \$10 annual dues, *see* **Exhibit 119**, <http://www.truityeducationfoundation.org/>). Exhibit 109.
- e. **Trust Federal Credit Union:** persons eligible to join include, among other persons, persons located anywhere in the U.S. who join the Chattanooga Audubon Society (\$35 annual membership fee, *see* **Exhibit 120**, membership page of the Chattanooga Audubon's website, located at <https://www.chattanoogaaudubon.org/membership.html>). Exhibit 46.

## **VII. Other Uses Of TRU-Prefix Marks For Financial Services, Real Estate Title Services, And Insurance Services**

69. In addition to identifying financial institutions in the United States using

*names* starting with "TRU," I also located many banks and credit unions,



and other financial service providers, who are using TRU-prefix marks for:







- a. *products and services*, such as credit cards and debit cards (e.g., TRULY SIMPLE, TRUCASH, TRUE LINK);


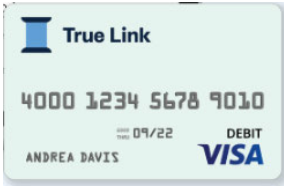

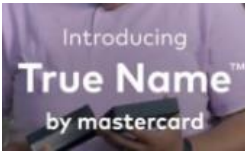











- b. *slogans* (e.g., TRULY PRICELESS);
- c. *other types of financial services*, such as financial advisory services and financial software-as-a-service (e.g., TRUSTLY, TRUEBILL, TRUE FINANCIAL); and
- d. *other types of services*, such as insurance services (e.g., TRUSTAGE, TRUASSURE, TRULUMA).

70. A sampling of those third parties--whose websites show they offer services nationally, or in North Carolina, South Carolina, or Virginia--are summarized in the table below, and discussed in detail thereafter.

	Mark	Services	Location/Website
a)	TRULY SIMPLE 	Credit card services	Branches in 10 states, including North Carolina (52 branches in NC), Florida, Georgia, Ohio, and Tennessee <a href="https://www.53.com/content/fifth-third/en/personal-banking/bank/credit-cards/truly-simple.html">https://www.53.com/content/fifth-third/en/personal-banking/bank/credit-cards/truly-simple.html</a>
b)	TRUEBRIDGE CAPITAL PARTNERS 	Asset management services	Chapel Hill, NC <a href="http://www.truebridgecapital.com/">http://www.truebridgecapital.com/</a>
c)	TRUNORTH ADVISORS	Financial advisory services,	Arden, NC, and SC <a href="https://retiretrunorth.com/">https://retiretrunorth.com/</a>




		retirement planning	
d)	TRUSTCOMPANY OF NORTH CAROLINA 	Wealth management services (unit of Fidelity Bank of N.C.)	NC and Southern Virginia <a href="https://www.trustcompanync.com/">https://www.trustcompanync.com/</a>
e)	TRUSTTREE FINANCIAL 	Financial planning services	Huntersville, NC <a href="https://trusttreefinancial.com/">https://trusttreefinancial.com/</a>
f)	-TRUE FIDUCIARY -TRUE FIDUCIARY SERVICES -TRUE FIDUCIARY ADVISOR -TRUE TRANSPARENCY -TRUE ROBO ADVISOR 	Wealth management services	Reston, VA <a href="https://www.pagnatokarp.com/">https://www.pagnatokarp.com/</a>
g)	TRUSTBUILDERS 	Financial and estate planning, and wealth management services	Greater Hampton Roads, VA <a href="https://trustbuilders.com/">https://trustbuilders.com/</a>
h)	TRUCASH 	Prepaid credit cards	<a href="https://www.trucash.com/">https://www.trucash.com/</a> and <a href="https://www.dcrstrategies.com/print">https://www.dcrstrategies.com/print</a>

i)	<b>TRUTAP</b> 	Mobile application allowing consumers to manage prepaid credit cards	<a href="https://www.dcrstrategies.com/trutap-v2-0/">https://www.dcrstrategies.com/trutap-v2-0/</a>
j)	<b>TRUE LINK</b> 	Prepaid debit card	<a href="https://www.truelinkfinancial.com/card/">https://www.truelinkfinancial.com/card/</a>
k)	<b>TRUE BLUE TRUEBLUE TRUE BLUE ONLINE</b> 	Credit cards, checking accounts, online banking services	<a href="https://capfed.com/">https://capfed.com/</a>
l)	<b>TRUE NAME</b> 	Credit card services	<a href="https://www.mastercard.us/en-us/consumers/offers-promotions/acceptancematters.html">https://www.mastercard.us/en-us/consumers/offers-promotions/acceptancematters.html</a>
m)	<b>TRULY PRICELESS</b> 	Credit card services	<a href="https://twitter.com/Mastercard/status/522840063969738752">https://twitter.com/Mastercard/status/522840063969738752</a>
n)	<b>TRUE LINE OF CREDIT</b> 	Loan services	<a href="https://www.headwaycapital.com/">https://www.headwaycapital.com/</a>
o)	<b>TRUVIEW</b>	Financial analytics services	<a href="http://www.statestreet.com/solutions/by-capability/ssgx/risk-trading/risk-analytics.html">http://www.statestreet.com/solutions/by-capability/ssgx/risk-trading/risk-analytics.html</a>



p)	<b>TRUSTLY</b>  <b>Trustly</b>	Online payment solution platform	<a href="https://www.trustly.net/us">https://www.trustly.net/us</a>
q)	<b>TRUSTCORE</b>  illuminate the possibilities.	Wealth management services	<a href="https://www.trustcore.com/">https://www.trustcore.com/</a>
r)	<b>TRUE CAPITAL MANAGEMENT</b>	Wealth management services	<a href="https://truecapitalmgmt.com/">https://truecapitalmgmt.com/</a>
s)	<b>TRUE FINANCIAL</b> 	Financial planning services	<a href="https://www.truefg.com/">https://www.truefg.com/</a>
t)	<b>TRU-SVC</b>	Payment processing services	<a href="http://trusvc.com/Tru-Svc_Payment_Processing.html">http://trusvc.com/Tru-Svc_Payment_Processing.html</a>
u)	<b>TRUVESTMENTS</b> 	Asset management and financial advisory services	<a href="https://www.truvestments.com/">https://www.truvestments.com/</a>
v)	<b>TRUINSURE</b> 	Insurance services	<a href="https://www.truinsure.com/">https://www.truinsure.com/</a>
w)	<b>TRUSTAGE</b> 	Insurance services	<a href="https://www.trustage.com/">https://www.trustage.com/</a>
x)	<b>TRUOPTIONS</b> 	Insurance services for family, home, and business	Raleigh, NC <a href="http://truoptions.com/">http://truoptions.com/</a>
y)	<b>TRUSTED CHOICE</b>	Insurance services	Alexandria, VA <a href="https://www.trustedchoice.com">https://www.trustedchoice.com</a>

			
z)	<p>TRU SERVICES</p> 	Insurance services (medical stop-loss)	<a href="https://www.truservices.com/">https://www.truservices.com/</a>
aa)	<p>TRUE BOOK</p> 	Financial appraisal and evaluation of vehicles, engines, and vehicles and aircraft parts	<p>Fairfax, VA</p> <a href="https://www.icf.com/technology/truebook">https://www.icf.com/technology/truebook</a>
bb)	<p>TRUE NORTH TITLE</p> 	Title and escrow services	<p>6 locations throughout VA</p> <a href="https://truenorthtitle.com/locations/">https://truenorthtitle.com/locations/</a>
cc)	<p>TRUEALTY</p> 	Real estate brokerage services	<p>Fairfax, CA</p> <a href="http://www.truealty.com/">http://www.truealty.com/</a>
dd)	<p>TRUGRIT PARTNERS</p> 	Accounting, recruiting, and staffing services	<p>Falls Church, VA</p> <a href="https://www.trugritpartners.com/">https://www.trugritpartners.com/</a>
ee)	<p>TRUE TOUCH</p> 	Bookkeeping and payroll services	<p>Dillon, SC</p> <a href="https://www.truetouchconsulting.com/">https://www.truetouchconsulting.com/</a>
ff)	<p>TRUE COST TO OWN</p>	Services to calculate costs	<a href="https://www.edmunds.com/tco.html">https://www.edmunds.com/tco.html</a>

		of auto purchasing and maintenance	
gg)	TRUE MARKET VALUE	Pricing software tool for automobiles	<a href="https://www.edmunds.com/tmv.html">https://www.edmunds.com/tmv.html</a>
hh)	TRUE HELP  <small>A Division of Allsup</small>	Advisory services concerning disability benefits	<a href="https://www.truehelp.com/">https://www.truehelp.com/</a>
ii)	TRUECONNECT 	Short term loan services to employees	<a href="https://trueconnectloan.com/">https://trueconnectloan.com/</a>
jj)	TRUECREDIT  <small>On the Road to Great Credit™</small>	Credit monitoring and protection services	<a href="https://www.truecredit.com/">https://www.truecredit.com/</a>
kk)	TRULUMA 	Disability insurance services	<a href="https://www.truluma.com/">https://www.truluma.com/</a>
ll)	TRUPO 	Insurance services for self-employed	<a href="https://www.trupo.com/">https://www.trupo.com/</a>
mm)	TRUSTMARK  <small>benefits beyond benefits</small>	Employee benefit and insurance services	<a href="https://trustmarkbenefits.com/">https://trustmarkbenefits.com/</a>
nn)	TRUSTMARK 	Automobile warranty services	<a href="https://trustmarkwarranty.com/">https://trustmarkwarranty.com/</a>
oo)	TRUSTTOKEN	Cryptocurrency issuer services	<a href="https://www.trusttoken.com/">https://www.trusttoken.com/</a>

		for individuals and companies	
pp)	<b>TRUSTWAY</b> 	Automobile insurance services	<a href="https://www.trustwaydirect.com/">https://www.trustwaydirect.com/</a>
qq)	<b>TRUEACCORD</b> 	Debt collection services	<a href="https://www.trueaccord.com/">https://www.trueaccord.com/</a>
rr)	<b>TRUASSURE</b> 	Insurance services	<a href="https://www.truassure.com/">https://www.truassure.com/</a>
ss)	<b>TRUEBILL</b> 	Personal finance management software	<a href="https://www.truebill.com/">https://www.truebill.com/</a>
tt)	<b>TRUFINANCIALS</b>	Financial education videos	<a href="https://trufinancials.com/">https://trufinancials.com/</a>
uu)	<b>TRUPANION</b> 	Pet insurance	<a href="https://trupanion.com/">https://trupanion.com/</a>



vv)	TRUPOINT TAX SERVICE 	Mobile and online tax preparation services	<a href="https://trupointtaxservice.com/trupoint-tax-service">https://trupointtaxservice.com/trupoint-tax-service</a>
ww)	TRUPATH CREDIT 	Credit repair services	<a href="https://trupathcredit.com/">https://trupathcredit.com/</a>

- a. **TRULY SIMPLE:** Attached as **Exhibit 121** is a true and correct copy of a webpage from Fifth Third Bank's website, located at <https://www.53.com/content/fifth-third/en/personal-banking/bank/credit-cards/truly-simple.html>. The webpage shows that Fifth Third Bank is using TRULY SIMPLE for a credit card, as shown below.



The TRULY SIMPLE credit card is available to consumers nationwide, except for residents of Vermont and Montana. (See **Exhibit 122**,

<https://www.53.com/content/dam/fifth-third/docs/legal/cards/2020/truly-simple-cc-terms-conditions.pdf>)

Fifth Third Bank has branches in 10 states (FL, GA, IL, IN, KY, MI, NC, OH, TN, WV), including five of the seven states in which Plaintiff offers its products-North Carolina, Florida, Georgia, Ohio, and Tennessee (*see supra*, ¶ 10(e))-with **52 branches located in North Carolina**. *See Exhibit 123* (captures of the following webpages from Fifth Third Bank's website, <https://locations.53.com/>; <https://locations.53.com/nc.html>).

- b. **TRUBRIDGE CAPITAL PARTNERS:** Attached as Exhibit 124 are true and correct copies of webpages from the website for TrueBridge Capital Partners, located at <http://www.truebridgecapital.com/>. The webpage shows that the company is located in Chapel Hill, North Carolina, and is using the mark TRUBRIDGE CAPITAL PARTNERS, and the logo identified in the above table, to offer alternative asset management services. The company invests in late-stage technology companies and venture capital managers worldwide, and produces with Forbes Magazine the annual Midas List that recognizes the world's top 100 venture capitalists. *See Exhibit 125*, <http://www.truebridgecapital.com/approach/>.

- c. **TRUNORTH ADVISORS:** Attached as **Exhibit 126** is a true and correct copy of a webpage from Resolute Capital LLC's website, located at <https://retiretrunorth.com/>. The webpage shows that the company has offices in Greer and Seneca, South Carolina, and Arden, North Carolina, and is using TRUNORTH ADVISORS, and the logo identified in the above table, to offer financial advisory services and retirement planning services.
- d. **TRUSTCOMPANY OF NORTH CAROLINA:** Attached as **Exhibit 127** is a true and correct copy of a webpage from Trust Company of North Carolina's website, located at <https://www.trustcompanync.com/>. The webpage shows that the company is located in Cary, North Carolina, and is using the mark TRUSTCOMPANY OF NORTH CAROLINA, and the logo referenced in the table above, to offer wealth management services.
- e. **TRUSTTREE FINANCIAL:** Attached as **Exhibit 128** is a true and correct copy of a webpage from TrustTree Financial's website, located at <https://trusttreefinancial.com/>. The webpage shows that the company is located in Huntersville, North Carolina, and is using

TRUSTTREE FINANCIAL and the logo referenced in the table above, to offer financial planning services.

- f. **TRUE FIDUCIARY:** Attached as **Exhibit 129** are true and correct copy of webpages from PagnatoKarp's website, located at <https://www.pagnatokarp.com/>; <https://www.pagnatokarp.com/who-we-are/>; <https://www.pagnatokarp.com/family-office/#truefiduciary>. The webpages show that the company is located in Reston, Virginia, and is using the mark TRUE FIDUCIARY to offer wealth management and tax advisory services.
- g. **TRUSTBUILDERS:** Attached as **Exhibit 130** is a true and correct copy of a webpage from Trust Builders Law Group, located at <https://trustbuilders.com/>. The webpage shows that the entity has offices in Yorktown, Saluda, Williamsburg, and Virginia Beach, Virginia, and that the entity is using TRUSTBUILDERS, and the logo referenced in the table above, to offer wealth management services and estate trust planning and management services.
- h. **TRUCASH:** Attached as **Exhibit 131** are true and correct copy of the websites associated with TRUCASH, located at <https://www.trucash.com/> and <https://www.dcrstrategies.com/print>.

Those websites show TRUCASH used for prepaid credit cards, as shown below. TRUCASH prepaid Visa cards are marketed throughout the U.S., and may be used anywhere in the world that Visa debit cards are accepted. *Id.*



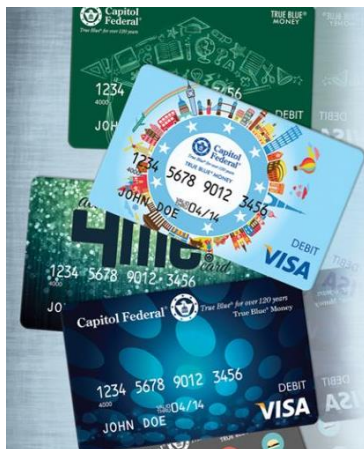
- i. **TRUTAP:** Attached as **Exhibit 132** is a copy of a webpage associated with TRUTAP, located at <https://www.dcrstrategies.com/trutap-v2-0/>. The website shows TRUTAP used for a mobile application that allows consumers to manage their TRUCASH prepaid cards, as shown below.



- j. **TRUE LINK:** Attached as **Exhibit 133** is a true and correct copy of a webpage from True Link Financial, Inc.'s website, located at <https://www.truelinkfinancial.com/card/>. The webpage shows that True Link Financial is using TRUE LINK for a prepaid debit card, as shown below, as well as financial advisory services. The True Link prepaid debit card is offered throughout the U.S. and may be used anywhere in the world that Visa debit cards are accepted. *Id.*



- k. **TRUE BLUE, TRUEBLUE, TRUE BLUE ONLINE:** Attached as **Exhibit 134** is a true and correct copy of the homepage from Capitol Federal Savings Bank's website, located at <https://capfed.com/>. Capitol Federal Savings Bank is a federally chartered mutual savings association with a principal place of business in Topeka, Kansas. Its website shows it offers a variety of savings and loan services, including general banking services, checking and savings accounts, certificates of deposit, a variety of personal and business loan programs, insurance and investment services, and online banking services, nationwide, under the marks TRUE BLUE, TRUEBLUE, and TRUE BLUE ONLINE.



True Blue® Direct VISA® Debit Card

Log in to:

True Blue Online®

User ID

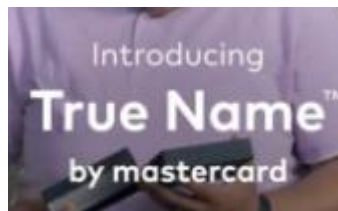
SIGN IN

[Get Enrolled](#)

True Blue® Money Prepaid Debit Card



- l. **TRUE NAME:** Attached as **Exhibit 135** is a true and correct copy of a webpage from MasterCard's website, located at <https://www.mastercard.us/en-us/consumers/offers-promotions/acceptancematters.html>. The webpage shows that MasterCard is using TRUE NAME for a credit card, as shown below.



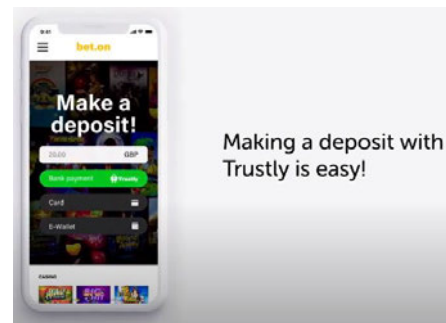
- m. **TRULY PRICELESS:** Attached as **Exhibit 136** is a true and correct copy of a webpage reflecting a post on MasterCard's Twitter page, located at <https://twitter.com/Mastercard/status/522840063969738752>. The webpage shows that MasterCard is using TRULY PRICELESS in connection with its credit card and digital payments service.



- n. **TRUE LINE OF CREDIT:** Attached as **Exhibit 137** is a true and correct copy of the homepage of Headway Capitol's website, located at <https://www.headwaycapital.com/>. The homepage shows that Headway Capitol is using TRUE LINE OF CREDIT in offering small business loans. Headway Capitol offers small business loans to businesses located in 36 states, including North Carolina, South Carolina, Virginia, Tennessee, Georgia, and Florida. **Exhibit 138**, <https://www.headwaycapital.com/faq>.
- o. **TRUVIEW:** Attached as **Exhibit 139**, is a true and correct copy of a webpage from State Street Bank's website, located at <http://www.statestreet.com/solutions/by-capability/ssgx/risk->

[trading/risk-analytics.html](https://www.statestreet.com/trading/risk-analytics.html). The website shows that State Street Bank uses TRUVIEW for its integrated analytics platform.

- p. **TRUSTLY**: Attached as **Exhibit 140** is a true and correct copy of a webpage from Trustly, Inc.'s website, located at <https://www.trustly.net/us>. The webpage shows that the company uses TRUSTLY, and the logo shown below, to offer its online payment solution platform enabling consumers to make online banking payments and deposits, as shown below. Trustly offers its services under the TRUSTLY mark throughout the United States. *Id.*



- q. **TRUSTCORE**: Attached as **Exhibit 141** is a true and correct copy of a webpage from TrustCore, LLC's website, located at <https://www.trustcore.com>. The webpage states that the company

serves consumers in 34 states, and shows that the company is using TRUSTCORE, and the logo referenced in the table above, to offer wealth management services.

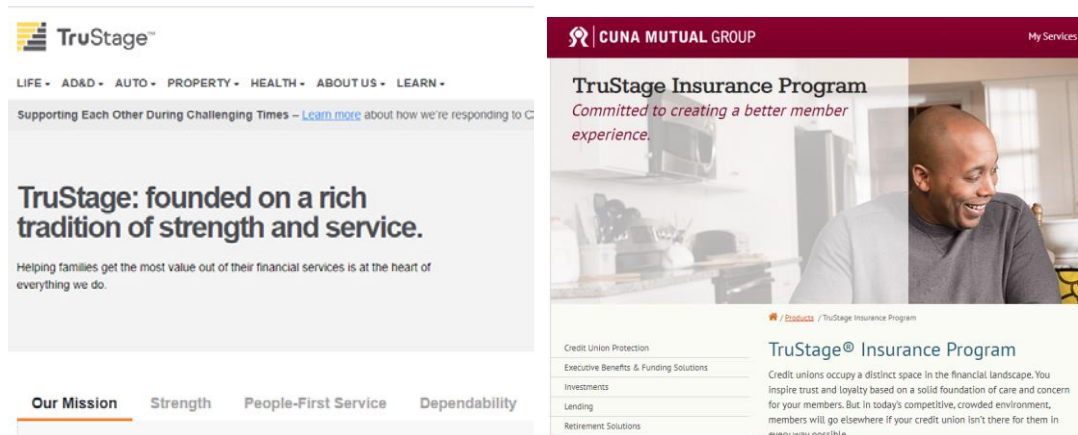
- r. **TRUE CAPITAL MANAGEMENT:** Attached as **Exhibit 142** is a true and correct copy of a webpage from True Capital Management's website, located at <https://truecapitalmgmt.com/>. The webpage states that it serves clients worldwide and shows that it is using TRUE CAPITAL MANAGEMENT, and the logo referenced in the table above, to offer wealth management services.
- s. **TRUE FINANCIAL:** Attached as **Exhibit 143** is a true and correct copy of a webpage from True Financial Group's website, located at <https://www.truefg.com>. The webpage states that the company serves customers nationwide and shows that it is using TRUE FINANCIAL, and the logo referenced in the table above, to offer its financial planning services.
- t. **TRU-SVC:** Attached as **Exhibit 144** is a true and correct copy of a webpage from the website for Tru-Svc Payment Systems, located at [http://trusvc.com/Tru-Svc\\_Payment\\_Processing.html](http://trusvc.com/Tru-Svc_Payment_Processing.html). The webpage

shows that the company is using TRU-SVC to offer payment processing services throughout the U.S.

- u. **TRUVESTMENTS:** Attached as **Exhibit 145** is a true and correct copy of a webpage from Truvestments Capital, LLC's website, located at <https://www.truvestments.com/>. The webpage states that the company offers its services nationwide, and shows that the company is using TRUVESTMENTS, and the logo referenced in the table above, to offer asset management and financial advisory services.
- v. **TRUINSURE:** Attached as **Exhibit 146** is a true and correct copy of the homepage of TruInsure's website, located at <https://www.truinsure.com/>, showing that the company offers home, vehicle, recreational vehicle, health, life, and business insurance nationwide under TRUINSURE.
- w. **TRUSTAGE INSURANCE:** Attached as **Exhibit 147** is a true and correct copy of the homepage of TruStage Insurance Agency, LLC's website, located at <https://www.trustage.com/> and webpages from CUNA Mutual Group's website, located at <https://www.cunamutual.com/products/trustage-insurance-program>

and

<https://www.cunamutual.com/-/media/cunamutual/trustage/program/public/trustage-program-overview.pdf>. As shown in the screenshot below, those webpages show that TruStage offers insurance services under TRUSTAGE throughout the U.S., as shown below, through thousands of credit unions.



Moreover, several of the third-party credit unions using TRU-prefix names identified above in Section V above offer their members TruStage insurance services, including **TruGrocer Federal Credit Union**, **TruEnergy Federal Credit Union**, **TruCore Federal Credit Union**, **TruPartner Credit Union**, **TruService Community**

**Federal Credit Union**, TruStone Financial Credit Union, and TruMark Financial Credit Union.

Additionally, when an Internet user visits TruStage's website located at *trustage.com*, the homepage advertises that "there's a credit union for everyone" and links to another website that allows one to search by location (at *yourmoneyfurther.com*), as shown below.

TruStage™ [BIENVENIDO!](#) | [HELP AND SUPPORT](#)  
1-855-245-1648

LIFE ▾ AD&D ▾ AUTO ▾ PROPERTY ▾ HEALTH ▾ ABOUT US ▾ LEARN ▾ [My Account](#)

Supporting Each Other During Challenging Times – [Learn more](#) about how we're responding to Coronavirus (COVID-19)

TruStage  
**LIFE INSURANCE**

Answer three simple questions and we'll deliver policy and pricing information to help you protect your family.

ZIP Code  Date of Birth MM  DD  YYYY  Gender Female  Male   
Ages 18-85

[GET PRICING](#)

- Instant decision
- 100% online

**Looking for COVID-19 Info?**  
For information about how TruStage is responding to the current pandemic, visit our Update page  
[COVID-19 Updates](#)

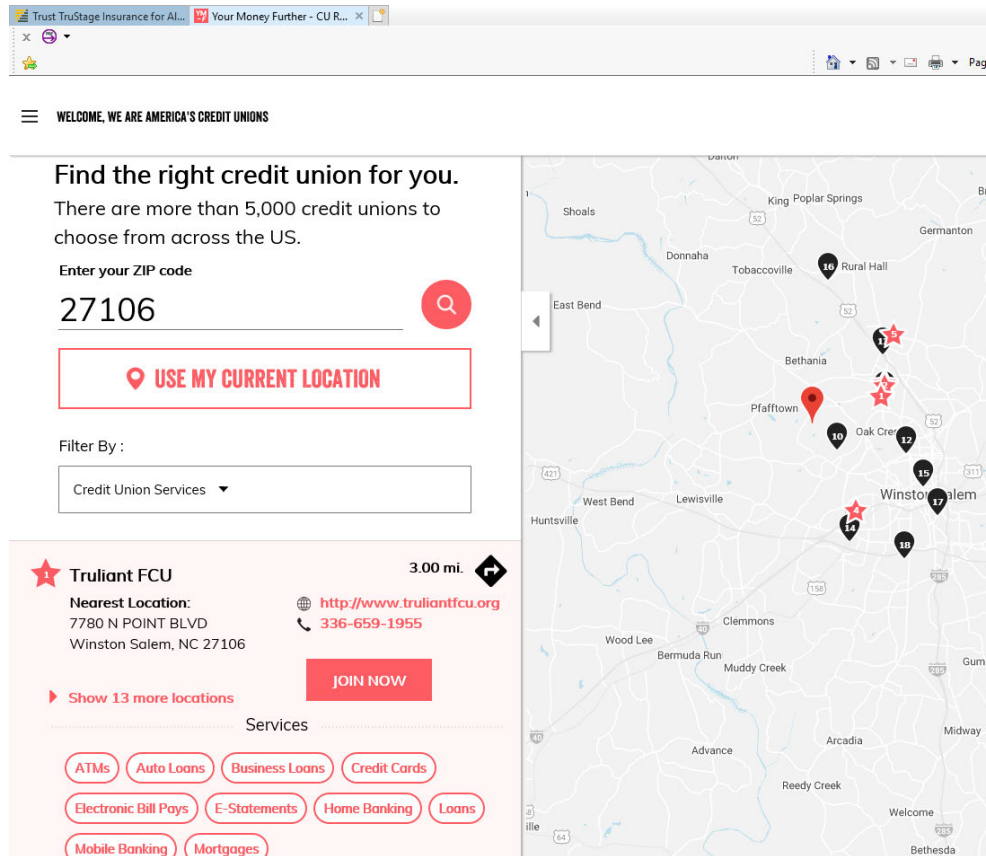
**Credit Union Member?**  
Enter your credit union's name to see member discount and special offers.  
[Find My Credit Union](#)

**Credit unions are putting people first.**  
There's a credit union for everyone. Find one that's right for you at [yourmoneyfurther.com](#)  
[Become a Member](#)

When one visits the linked website at *yourmoneyfurther.com* and enters a location where Truliant Federal Credit Union has branches, the website lists the nearby Truliant Federal Credit Union branch(es).



For example, searching for the zip code 27106, which covers part of Winston-Salem, returns the result shown below:



- x. **TRUOPTIONS:** Attached as **Exhibit 148** is a true and correct copy of a webpage from Truoptions Financial Services, LLC's website, located at <http://truoptions.com/>. The webpage shows that the

company is located in Raleigh, NC, and is using TRUOPTIONS, and the logo referenced in the table above, to offer insurance services.

- y. **TRUSTED CHOICE:** Attached as **Exhibit 149** is a true and correct copy of a webpage from Trusted Choice's website, located at <https://www.trustedchoice.com>. The webpage shows that the company is located in Fairfax, VA, and is using TRUSTED CHOICE and the logo referenced in the table above, to offer an online insurance platform.
- z. **TRU SERVICES:** Attached as **Exhibit 150** is a true and correct copy of a webpage from the website of TRU Services, located at <https://www.truservices.com/>. The webpage shows that the company is using TRU SERVICES, and the logo referenced in the table above, to offer medical stop-loss insurance services throughout the U.S.
- aa. **TRUE BOOK:** Attached as **Exhibit 151** is a true and correct copy of a webpage from ICF Consulting Group's website, located at <https://www.icf.com/technology/truebook>. The webpage shows that the company is located in Fairfax, Virginia, and is using TRUEBOOK to offer an online platform for aircraft appraisals.

- bb. **TRUE NORTH TITLE: Exhibit 152** is a true and correct copy of a webpage from True North Title's website, located at <https://truenorthtitle.com>. The webpage shows that the company has six offices in Virginia (Blacksburg, Virginia Beach, Chesapeake, Chesapeake, Franklin, and Wytheville) and is using TRUE NORTH TITLE, and the logo referenced in the table above, to offer title and escrow services.
- cc. **TRUEALTY: Exhibit 153** is a true and correct copy of a webpage from Truealty's website, located at <http://www.truealty.com/>. The webpage shows that the company is located in Fairfax, Virginia, and is using TRUEALTY, and the logo referenced in the table above, to offer real estate brokerage and investment services.
- dd. **TRUGRIT PARTNERS: Exhibit 154** is a true and correct copy of a webpage from TrueGrit Partners' website, located at <https://www.trugritpartners.com/>. The webpage shows that the company is located in Falls Church, Virginia, and is using TRUGRIT PARTNERS, and the logo referenced in the table above, to offer accounting, employment, recruiting, and staffing services.

- ee. **TRUE TOUCH:** Attached as **Exhibit 155** is a true and correct copy of a webpage from True Touch Tax & Financial Services, LLC's website, located at <https://www.truetouchconsulting.com/>. The webpage shows that the company is located in Dillon, South Carolina, and uses TRUE TOUCH to offer bookkeeping and payroll services.
- ff. **TRUE COST TO OWN:** Attached as **Exhibit 156** is a true and correct copy of a webpage from the website Edmunds.com, located at <https://www.edmunds.com/tco.html>. The webpage shows that Edmunds.com, Inc. is using TRUE COST TO OWN to offer services consisting of software used to calculate pricing for automobile purchases and maintenance. Edmunds guides online car shoppers nationwide. *Id.*
- gg. **TRUE MARKET VALUE:** Attached as **Exhibit 157** is a true and correct copy of a webpage from the website Edmunds.com, located at <https://www.edmunds.com/tmv.html>. The webpage shows that Edmunds.com, Inc. is using TRUE MARKET VALUE, to offer services consisting of software used to calculate pricing for automobile purchases. Edmunds guides online car shoppers nationwide. *Id.*

- hh. **TRUE HELP:** Attached as **Exhibit 158** is a true and correct copy of a webpage from True Help's website, located at <https://www.truehelp.com>. The webpage shows that the company is using TRUE HELP, and the logo referenced in the table above, to offer advisory services concerning disability benefits. True Help is a national provider of customized, expert disability claim services. *Id.*
- ii. **TRUECONNECT:** Attached as **Exhibit 159** is a true and correct copy of a webpage from TrueConnect's website, located at <https://trueconnectloan.com>. The webpage shows that the company is using TRUECONNECT to offer short term loan services as an employee benefit, throughout the U.S. *Id.*
- jj. **TRUECREDIT:** Attached as **Exhibit 160** is a true and correct copy of a webpage from TrueCredit's website, located at <https://www.truecredit.com/>. The webpage shows that the company is using TRUECREDIT, and the logo referenced in the table above, to offer credit monitoring and protection services, throughout the U.S.
- kk. **TRULUMA:** Attached as **Exhibit 161** is a true and correct copy of a webpage from Truluma's website, located at <https://www.truluma.com>. The webpage shows that the company is

using TRULUMA, and the logo referenced in the table above, to offer disability insurance services, in all 50 states. *Id.*

- ll. **TRUPO:** Attached as **Exhibit 162** is a true and correct copy of a webpage from Trupo's website, located at <https://www.trupo.com/>. The webpage shows that the company is using TRUPO, and the logo referenced in the table above, to offer its insurance services for freelancers and persons who are self-employed, residing in Arizona, California, Connecticut, Florida, Illinois, Maryland, Michigan, New Jersey, New York, Oregon, Pennsylvania, Tennessee, Texas, Virginia, and the District of Columbia.
- mm. **TRUSTMARK:** Attached as **Exhibit 163** is a true and correct copy of a webpage from Trustmark Insurance's website, located at <https://trustmarkbenefits.com/>. The webpage shows that the company is using TRUSTMARK, and the logo referenced in the table above, to offer employee benefit and insurance services nationwide.
- nn. **TRUSTMARK:** Attached as **Exhibit 164** is a true and correct copy of a webpage from A.U.L. Corporation's website, located at <https://trustmarkwarranty.com/>. That webpage shows that the

company is using TRUSTMARK, and the logo referenced in the table above, to offer automobile warranty services nationwide.

- oo. **TRUSTTOKEN:** Attached as **Exhibit 165** is a true and correct copy of a webpage from TrustToken's website, located at <https://www.trusttoken.com>. The webpage shows that the company is using TRUSTTOKEN, and the logo referenced in the table above, to offer cryptocurrency and cryptocurrency issuer services, throughout the U.S.
- pp. **TRUSTWAY:** Attached as **Exhibit 166** is a true and correct copy of a webpage from Trustway Insurance's website, located at <https://www.trustwaydirect.com/>. The webpage shows that the company is using TRUSTWAY, the logo referenced in the table above, to offer automobile insurance services throughout the U.S.
- qq. **TRUEACCORD:** Attached as **Exhibit 167** is a true and correct copy of a webpage from TrueAccord's website, located at <https://www.trueaccord.com/>. The webpage shows that the company is using TRUEACCORD, and the logo referenced in the table above, to offer debt collection services throughout the U.S.



- rr. **TRUASSURE:** Attached as **Exhibit 168** is a true and correct copy of a webpage from TruAssure Insurance Company's website, located at <https://www.truassure.com/>. The webpage shows that the company is using TRUASSURE, and the logo referenced in the table above, to offer dental insurance services and dental savings plan services throughout the U.S.
- ss. **TRUEBILL:** Attached as **Exhibit 169** is a true and correct copy of a webpage from True Bill, Inc.'s website, located at <https://www.truebill.com/>. The webpage shows that the company is using TRUEBILL, and the logo referenced in the table above, to offer personal finance management software, throughout the U.S.
- tt. **TRUFINANCIALS:** Attached as **Exhibit 170** is a true and correct copy of a webpage from Denis Trufin's website, located at <https://trufinancials.com/>. The webpage shows that Mr. Trufin uses TRUFINANCIALS to offer financial education videos to consumers located in the U.S.
- uu. **TRUPANION:** Attached as **Exhibit 171** is a true and correct copy of a webpage from Trupanion Managers USA, Inc.'s website, located at <https://trupanion.com/>. The webpage shows that the company is using

TRUPANION, and the logo referenced in the table above, to offer pet insurance services throughout the U.S.

vv. **TRUPOINT TAX SERVICE:** Attached as **Exhibit 172** is a true and correct copy of a webpage from the website of Trupoint Tax Services, located at <https://trupointtaxservice.com/trupoint-tax-service>. The webpage shows that the company is using TRUPOINT TAX SERVICE, and the logo referenced in the table above, to offer tax preparation services throughout the U.S.

ww. **TRUPATH CREDIT, TRUPATH OPTIMIZE, TRUPATH FLOAT, TRUPATH RESTORE:** Attached as **Exhibit 173** are true and correct copies webpage from the website of TruPath Credit, located at <https://trupathcredit.com/> and <https://trupathcredit.com/pricing-2/>. The webpages show that the company is using TRUPOINT CREDIT, and the logo referenced in the above table, to offer credit repair services throughout the U.S. The webpages also show that the company uses the marks **TRUPATH OPTIMIZE, TRUPATH FLOAT, and TRUPATH RESTORE** for its specific service offerings.

## VIII. Uses of TRU-prefix Marks for Consumer Products & Services

71. Finally, my research also identified an extensive number of websites and webpages showing TRU-prefix marks offering (i) a wide range of consumer products and services nationwide, or (ii) which are operated by entities with addresses located in North Carolina, South Carolina, and/or Virginia. Attached as **Exhibit 175** are true and correct copies of webpages showing use of a sampling of the TRU-prefix marks I identified, as referenced below.

Consumer Products & Services		
Mark	Goods / Services & Location (Marks listed without a location are offered nationwide)	Webpage showing use of the mark
TRU + deli TRU + bar	Restaurant and bar (Chapel Hill, NC)	<a href="https://www.trudeli.com/">https://www.trudeli.com/</a>
TRU ALIGNMENT	Chiropractic services (Matthews, NC)	<a href="https://www.facebook.com/pg/trualignmentchiro/about/?ref=page_internal">https://www.facebook.com/pg/trualignmentchiro/about/?ref=page_internal</a>
TRU AQUATICS	Pool construction/management services (Apex, NC)	<a href="https://www.linkedin.com/company/tru-aquatics/">https://www.linkedin.com/company/tru-aquatics/</a> <a href="https://www.facebook.com/pg/TRUAquatics/about/?ref=page_internal">https://www.facebook.com/pg/TRUAquatics/about/?ref=page_internal</a>
TRU BLENDS BARBERSHOP	Hair care services (Greenville, NC)	<a href="https://www.facebook.com/Truthebarber77/">https://www.facebook.com/Truthebarber77/</a>
TRU BY HILTON	Hotel services (multiple locations throughout NC, and the U.S.)	<a href="https://www.hilton.com/en/hotels/cltcaru-tru-charlotte-ayrsley/">https://www.hilton.com/en/hotels/cltcaru-tru-charlotte-ayrsley/</a>
TRU COLORS	Brewery and beer (NC)	<a href="https://www.trucolors.co/beer">https://www.trucolors.co/beer</a>

TRU COUNSELING & CONSULTING	Counseling services (Washington, NC)	<a href="https://trucounseling.com">https://trucounseling.com</a>
TRU ESTHETICS	Spa services (Charlotte, NC)	<a href="https://www.truesthetics.com/">https://www.truesthetics.com/</a>
Trü Orthodontics	Dental services (Burke and Fairfax, VA)	<a href="https://www.truorthodontics.us/">https://www.truorthodontics.us/</a>
TRU PILATES	Fitness instruction services (Charlottesville, VA)	<a href="https://www.trupilates.com/">https://www.trupilates.com/</a>
TRU POWER FITNESS	Personal training services. (Virginia Beach, VA)	<a href="http://www.trupowerfitness.org/">http://www.trupowerfitness.org/</a>
TRU TAEKWONDO CENTER	Taekwondo instruction centers (2 locations in Winston-Salem, 1 in Kernersville, 1 in Bermuda Run, NC)	<a href="https://www.trutkd.com/locations">https://www.trutkd.com/locations</a>
TRUBAN MOTOR COMPANY	Automobile dealer services (Winchester, VA)	<a href="http://www.trubanmotors.com/">http://www.trubanmotors.com/</a>
TRUBILD	Property management services (SC)	<a href="https://www.trubild.com/">https://www.trubild.com/</a>
TRUBLU REALTY	Realty services (Raleigh, NC)	<a href="https://trublurealty.com/">https://trublurealty.com/</a>
TRUBLUE RENOVATIONS	Residential construction services (Fayetteville, NC)	<a href="https://trubluereno.com/">https://trubluereno.com/</a>
TRUCARE CARDIOLOGY & VASCULAR MEDICINE	Medical services (Charlottesville, VA)	<a href="https://www.facebook.com/pages/category/Local-Business/TruCare-Cardiology-Vascular-Medicine-519518648387911/">https://www.facebook.com/pages/category/Local-Business/TruCare-Cardiology-Vascular-Medicine-519518648387911/</a>
TRUCE	Life coaching services (Sterling, VA)	<a href="https://truceinc.com/">https://truceinc.com/</a>
TRUCLASS EVENTS	Event planning services (Portsmouth, VA)	<a href="http://www.truclassevents.com/about.html">http://www.truclassevents.com/about.html</a>
TRUCLEAN	Carpet and upholstery cleaning services (Wilmington, NC)	<a href="https://www.facebook.com/TruCleanCarpetCleaning/">https://www.facebook.com/TruCleanCarpetCleaning/</a>
TRU-COAT	General contractor (New Bern and Eastern NC)	<a href="http://www.trucoatinc.com/">http://www.trucoatinc.com/</a>
TRUCOAT PAINTING	Painting services (NC)	<a href="https://www.trucoatpainting.com/">https://www.trucoatpainting.com/</a>

TRUCORE GROUP	IT services provider (NC)	<a href="http://www.trucoretg.com/about-us/">http://www.trucoretg.com/about-us/</a>
TRU-CUTS	Hair care services (Newport News, VA)	<a href="https://www.facebook.com/pages/Tru-Cuts/125217417532557">https://www.facebook.com/pages/Tru-Cuts/125217417532557</a>
TRUE AIM TACTICAL	Firearms and accessory retailer (Hampton, VA)	<a href="https://www.trueaimtactical.com/">https://www.trueaimtactical.com/</a>
TRUE BBQ	Restaurant services. West (Columbia, SC)	<a href="http://www.true-bbq.com/">http://www.true-bbq.com/</a>
TRUE BLEU HEALING ARTS	Massage therapy services. (Richmond, VA)	<a href="https://truebleuhealing.com/indExhibit.html">https://truebleuhealing.com/indExhibit.html</a>
TRUE BLUE APPLIANCE REPAIR & SERVICE	Appliance repair services. (Newport News, VA)	<a href="http://trublueservice.com/">http://trublueservice.com/</a>
TRUE BLUE NOTARY SERVICES	Notary services (Multiple locations in VA)	<a href="https://truebluenotaryservicesllc.com/">https://truebluenotaryservicesllc.com/</a>
TRUE BLUE RACING PARTS	Automobile parts. (Arlington, VA, and has online store)	<a href="http://www.trueblueracingparts.com/">http://www.trueblueracingparts.com/</a>
TRUE CONSTRUCTION	Construction services (Lynchburg, VA)	<a href="https://trueconstruction.us/">https://trueconstruction.us/</a>
TRUE CRAFTED CATERING	Catering services (SC)	<a href="https://truecraftedcatering.com">https://truecraftedcatering.com</a>
TRUE CUSTOM	Residential construction services (Central VA)	<a href="http://truecustomva.com/">http://truecustomva.com/</a>
TRUE HOMES	New home developments (NC and SC)	<a href="https://www.truehomesusa.com/">https://www.truehomesusa.com/</a>
TRUE LINE CONSTRUCTION COMPANY	Construction services. (Bristol, VA)	<a href="http://www.truelinellc.com/">http://www.truelinellc.com/</a>
TRUE NORTH	Yoga instruction services (Richmond, VA)	<a href="https://truenorthrva.com/">https://truenorthrva.com/</a>
TRUE NORTH BUILDING COMPANY	Home construction services (Brunswick County, NC)	<a href="http://www.truenorthbuild.com/">http://www.truenorthbuild.com/</a>
TRUE SOUTHERN SMOKE BBQ	Restaurant services (Chesapeake, VA)	<a href="https://www.tssbbq.com/about">https://www.tssbbq.com/about</a>

TRUEAP	Fitness training services. (Ashburn, VA)	<a href="https://trueap.com/">https://trueap.com/</a>
TRUECORE MEDIA	Video and media services for personal and corporate projects (Raleigh, NC)	<a href="https://www.truecoremedia.com/">https://www.truecoremedia.com/</a>
TRUFITGYM	Athletic club (7 locations in NC)	<a href="https://www.trufitgym.com/locations">https://www.trufitgym.com/locations</a>
TRUFLO	Pump manufacturer (Greensboro, NC)	<a href="https://www.truflo.com/about-us/">https://www.truflo.com/about-us/</a>
TRUGUARD	Remodeling services (greater Charlotte, NC area)	<a href="https://www.truguardconstruction.com/">https://www.truguardconstruction.com/</a>
TRU-PAK	Residential and commercial moving services (Conover, NC)	<a href="https://www.tru-pak.com/">https://www.tru-pak.com/</a>
TRU-POWER	Maintenance services for power quality hardware (Glen Allen and Henrico, VA)	<a href="http://www.tru-power.com/about.html">http://www.tru-power.com/about.html</a>
TRUPOINT MARKETING	Marketing, web design, and product development services (Winston-Salem, NC)	<a href="https://trupointmarketing.com/">https://trupointmarketing.com/</a>
TRUSHINE CAR CASH	Car wash services (Bristol and Abingdon, VA)	<a href="https://www.trushinecarwash.com/">https://www.trushinecarwash.com/</a>
TRUSST BUILDER GROUP	Retail construction services (NC)	<a href="https://trusstbuildergroup.com/">https://trusstbuildergroup.com/</a>
TRUTEAM	Insulation installation services (throughout NC)	<a href="https://www.truteam.com/branches/nc/">https://www.truteam.com/branches/nc/</a>
TRU	Cosmetics	<a href="https://trubautyusa.com/">https://trubautyusa.com/</a>
TRU	Custom furniture design services	<a href="http://www.trufurniture.com">http://www.trufurniture.com</a>
TRU BODY WELLNESS	Nutritional supplements	<a href="https://www.trubodywellness.com/">https://www.trubodywellness.com/</a>
TRU CHOCOLATE	Chocolate	<a href="https://tru-chocolate.com/">https://tru-chocolate.com/</a>
TRU EDUCATION	Spiritual educational services	<a href="https://livetru.org/">https://livetru.org/</a>
TRU ELEMENTS	Spiritual counseling and natural products	<a href="https://tru-elements.com/">https://tru-elements.com/</a>
TRU ESSENTIAL	Skincare products	<a href="https://www.truessential.com/shop">https://www.truessential.com/shop</a>
TRU FINE WINES & SPIRITS	Wine & spirits	<a href="http://www.truestatesandvineyards.com">http://www.truestatesandvineyards.com</a>
TRU GAMING	Online voice and gaming service	<a href="https://trugaming.com/">https://trugaming.com/</a>



TRU GRILL	Chicken grocery products	<a href="http://www.gourmetboutique.com/trugrill/">http://www.gourmetboutique.com/trugrill/</a>
TRU HOTELS & RESORTS	Hotels	<a href="http://truhotelsandresorts.com/">http://truhotelsandresorts.com/</a>
TRU MOBILE HOMES	Mobile homes	<a href="https://www.truemobilehomes.com/">https://www.truemobilehomes.com/</a>
TRU THE PRODUCT	Haircare products	<a href="http://www.trutheproduct.com">http://www.trutheproduct.com</a>
TRU TRAVEL SOLUTIONS	Travel booking services and meeting logistics services	<a href="https://tru-trav.com">https://tru-trav.com</a>
TRUAIRE	Residential grilles, registers, and diffusers (vent hardware)	<a href="http://truaire.com">http://truaire.com</a>
TRUART	Art supplies	<a href="https://truart.co/">https://truart.co/</a>
TRUAUDIO	Home audio equipment	<a href="https://www.truaudio.com/">https://www.truaudio.com/</a>
TRUBABY	Baby skincare	<a href="https://www.trukid.com/collections/trubaby-baby-care?view=all">https://www.trukid.com/collections/trubaby-baby-care?view=all</a>
TRUBEAUTY	Skincare products	<a href="https://www.trubautyshop.com/">https://www.trubautyshop.com/</a>
TRUBEE HONEY	Honey	<a href="https://www.trubeehoney.com">https://www.trubeehoney.com</a>
TRUBLEND	Cosmetics	<a href="https://www.covergirl.com/en_us/collection-makeup/trublend/">https://www.covergirl.com/en_us/collection-makeup/trublend/</a>
TRU-BLU	Cookies	<a href="http://www.abimarfoods.com/work/tru-blu-cremes/">http://www.abimarfoods.com/work/tru-blu-cremes/</a>
TRUBOWL	Health food café	<a href="https://trubowl.com/">https://trubowl.com/</a>
TRUBRAIN	Nutritional supplements	<a href="https://www.trubrain.com">https://www.trubrain.com</a>
TRUBRAND	Product authentication software	<a href="https://www.spsy.com/products-and-services/brand-protection/trubrand/">https://www.spsy.com/products-and-services/brand-protection/trubrand/</a>
TRUCABINETRY	Residential cabinets	<a href="https://www.trucabinetry.com/">https://www.trucabinetry.com/</a>
TRUCARE	Nutritional supplements for pets	<a href="http://trucareminerals.com/">http://trucareminerals.com/</a>
TRU-COLOR PAINT	Model paint	<a href="http://trucolorpaint.com/">http://trucolorpaint.com/</a>
TRUCUP COFFEE	Coffee	<a href="https://trucup.com">https://trucup.com</a>

TRUCURL	Haircare	<a href="https://colorproof.com/collections/trucurl">https://colorproof.com/collections/trucurl</a>
TRUDEED	Software for real estate purchasing and sales	<a href="https://trudeed.com/">https://trudeed.com/</a>
TRUDERMA	Nutrition supplements	<a href="https://truderma.com">https://truderma.com</a>
TRUDIARY	Consumer telehealth platform	<a href="https://trudiary.com">https://trudiary.com</a>
TRUDOG	Pet supplies	<a href="https://shop.trudog.com">https://shop.trudog.com</a>
TRUDREAM PROPERTIES	Real estate purchasing services in multiple states, including a few listings in North Carolina	<a href="https://www.trudreamproperties.com">https://www.trudreamproperties.com</a>
TRUDROP	Planters for flowers and plants	<a href="http://trudrop.com/">http://trudrop.com/</a>
TRUE	Home fitness machines	<a href="https://truefitness.com/">https://truefitness.com/</a>
TRUE BLUE SERVICE DOGS	Non-profit organization providing service dogs to persons in need throughout the U.S.	<a href="https://www.trueblueservicedogs.org/">https://www.trueblueservicedogs.org/</a>
TRUE FOOD KITCHEN	Restaurant with locations in 17 states, including VA	<a href="https://www.truefoodkitchen.com/">https://www.truefoodkitchen.com/</a>
TRUE GLOW	Facial cleansing brush	<a href="https://www.conair.com/c/30f56/sonic-facial-brush-whitegreen/884">https://www.conair.com/c/30f56/sonic-facial-brush-whitegreen/884</a>
TRUE HEALTH INITIATIVE	Non-profit working to end preventable disease and sustain the health of the planet	<a href="https://www.truehealthinitiative.org">https://www.truehealthinitiative.org</a>
TRUE METHOD	Pilates instruction	<a href="https://www.truemethodpilates.com/">https://www.truemethodpilates.com/</a>
TRUE NATURAL FOODS	Natural foods	<a href="https://www.truenaturalfoods.com/">https://www.truenaturalfoods.com/</a>
TRUE PRODUCTS	Laundry detergent	<a href="https://www.thetrueproducts.com">https://www.thetrueproducts.com</a>
TRUE RELIGION	Clothing	<a href="https://www.truereligion.com">https://www.truereligion.com</a>
TRUE SOFT	Toothbrushes	<a href="https://www.kleenteeth.com/lactona-m39-nylon-true-soft-toothbrush/">https://www.kleenteeth.com/lactona-m39-nylon-true-soft-toothbrush/</a>
TRUE TEMPER	Golf shafts	<a href="https://www.trueemper.com/">https://www.trueemper.com/</a>
TRUE VALUE	Retail hardware store services.	<a href="https://www.truevalue.com/">https://www.truevalue.com/</a>
TRUEARTH	Laundry detergent	<a href="https://www.tru.earth/">https://www.tru.earth/</a>



TRUEBLUE	Travel rewards program for JetBlue airline	<a href="https://www.jetblue.com/rueblue/reasons-to-join">https://www.jetblue.com/rueblue/reasons-to-join</a>
TRUEBLUE	Pet supplies	<a href="https://www.truebluepets.com/">https://www.truebluepets.com/</a>
TRUEBLUE	Specialized workforce services.	<a href="https://www.trueblue.com/home">https://www.trueblue.com/home</a>
TRUECAR	Online database for purchase and sale of automobiles	<a href="https://www.truecar.com">https://www.truecar.com</a>
TRUECUBES	Ice cube molds	<a href="https://www.truecubes.com/">https://www.truecubes.com/</a>
TRUEDARK	Blue light blocking sunglasses	<a href="https://truedark.com">https://truedark.com</a>
TRUEDIT	Online content creation and automation software	<a href="https://truedit.com/">https://truedit.com/</a>
TRUEEYE	Contact lenses	<a href="https://www.acuvue.com/contact-lenses/acuvue-trueye-1-day">https://www.acuvue.com/contact-lenses/acuvue-trueye-1-day</a>
TRUEFIRE GOURMET	Wood grilling planks, wraps, and roasters	<a href="https://truefiregourmet.com/">https://truefiregourmet.com/</a>
TRUEHEALTH	Vitamin supplements	<a href="https://www.truehealth.com">https://www.truehealth.com</a>
TRUEKEY	Password management software	<a href="https://www.truekey.com">https://www.truekey.com</a>
TRUELEARN	Exam preparation products	<a href="https://truelearn.com/">https://truelearn.com/</a>
TRUEENERGY	Energy drinks	<a href="https://drinktru.com/collections/tru-shots">https://drinktru.com/collections/tru-shots</a>
TRUESEAL	Food storage containers	<a href="https://www.anchorhocking.com/food-storage/trueseal-glass-storage.html">https://www.anchorhocking.com/food-storage/trueseal-glass-storage.html</a>
TRU-FIT	Disposable cooking pans	<a href="https://www.handi-foil.com/hfa/tru-fit-steam-table-pans/">https://www.handi-foil.com/hfa/tru-fit-steam-table-pans/</a>
TRUFLEX	Shoes	<a href="https://www.rockport.com/technology.html">https://www.rockport.com/technology.html</a>
TRU-FLO	Salt	<a href="https://unitedsalt.com/salt-products/tru-flo-evaporated-food-grade/">https://unitedsalt.com/salt-products/tru-flo-evaporated-food-grade/</a>
TRUFORM	Compression legwear	<a href="https://truform.com">https://truform.com</a>
TRU-FORM NAILS	Nail care products	<a href="https://truformnails.com/">https://truformnails.com/</a>
TRUFRU	Chocolate and fruit products	<a href="https://trufru.com">https://trufru.com</a>

TRUFRUIT	Fruit snacks	<a href="http://trufruit.com/">http://trufruit.com/</a>
TRUFUEL	Fuel for residential lawn care equipment	<a href="https://trufuel50.com">https://trufuel50.com</a>
TRUFUSION	Exercise studio with locations in 8 states	<a href="https://trufusion.com">https://trufusion.com</a>
TRUGOLF	Golf simulators	<a href="https://trugolf.com/">https://trugolf.com/</a>
TRUGREEN	Lawn care services	<a href="https://www.trugreen.com">https://www.trugreen.com</a>
TRUHAIR	Haircare products	<a href="https://truhair.com/">https://truhair.com/</a>
TRUHOME	Home remodeling services	<a href="https://truhomeinc.com">https://truhomeinc.com</a>
TRUIDENTITY	Identity theft recovery and monitoring services	<a href="https://www.truwarranty.co/truidentity">https://www.truwarranty.co/truidentity</a>
TRU-JUICE	Juice	<a href="https://wisynco.com/tru-juice/">https://wisynco.com/tru-juice/</a>
TRULABS	Nutritional supplements	<a href="https://trulabs.com/">https://trulabs.com/</a>
TRULIA	Online database for purchase, sale, and rental of residential real estate	<a href="https://www.trulia.com/">https://www.trulia.com/</a>
TRULIANT	Medical device for use in knee replacement surgery	<a href="https://www.exac.com/knee/truliant-knee-system">https://www.exac.com/knee/truliant-knee-system</a>
TRULIANT HEALTH SYSTEMS	Behavioral health agency in Georgia	<a href="https://npino.com/behavioral-health/1093093759-truliant-health-systems/">https://npino.com/behavioral-health/1093093759-truliant-health-systems/</a>
TRULICITY	Medication to treat diabetes	<a href="https://www.trulicity.com/">https://www.trulicity.com/</a>
TRULINGO	T-shirts	<a href="https://trulingotshirts.bigcartel.com/">https://trulingotshirts.bigcartel.com/</a>
TRULY	Alcoholic seltzer	<a href="https://trulyhardseltzer.com">https://trulyhardseltzer.com</a>
TRUMARINE	Nutritional supplement	<a href="https://withinus.com/collections/collagen">https://withinus.com/collections/collagen</a>
TRUMEDICAL SOLUTIONS	Healthcare products	<a href="http://www.tru-medical.com/">http://www.tru-medical.com/</a>
TRUMOO	Milk products	<a href="https://www.trumoo.com/">https://www.trumoo.com/</a>
TRUNICE	Nutritional supplements	<a href="http://trunice.us/">http://trunice.us/</a>
TRUNUDE	Undergarments	<a href="https://mytrunude.com/">https://mytrunude.com/</a>
TRU-NUT	Powdered almond butter	<a href="https://tru-nutbutter.com/">https://tru-nutbutter.com/</a>
TRUORGANICS	Residential decking	<a href="https://www.calibamboo.com/truorganics.html">https://www.calibamboo.com/truorganics.html</a>
TRUPEN	Electronic pen	<a href="https://us.dynabook.com/trupen">https://us.dynabook.com/trupen</a>

TRUPHONE	Cellular phone services	<a href="https://www.truphone.com/us">https://www.truphone.com/us</a>
TRURAW	Fermented foods	<a href="https://www.trurawfoods.com/">https://www.trurawfoods.com/</a>
TRUREALTY	Real estate sales	<a href="https://www.trurealty.com/">https://www.trurealty.com/</a>
TRUROOMS	Online furniture shopping services	<a href="http://www.trurooms.com">http://www.trurooms.com</a>
TRUROOTS	Organic grain foods	<a href="https://www.truroots.com/">https://www.truroots.com/</a>
TRU-SCAPES	Outdoor lighting and fixtures for residential properties	<a href="https://www.tru-scapes.com/">https://www.tru-scapes.com/</a>
TRUSCORE	Professional coaching services	<a href="https://www.truscore.com/">https://www.truscore.com/</a>
TRUSKIN	Skincare	<a href="https://truskin.com/">https://truskin.com/</a>
TRUSNAP	Plastic paint cans	<a href="https://www.kwcontainer.com/containers">https://www.kwcontainer.com/containers</a>
TRUSONA	Internet security services	<a href="https://www.trusona.com">https://www.trusona.com</a>
TRUSQUARE	Woodworking tool	<a href="http://www.trusquare.com/home.html">http://www.trusquare.com/home.html</a>
TRU-STAY	Adhesive bandages	<a href="https://www.band-aid.com/products/tru-stay">https://www.band-aid.com/products/tru-stay</a>
TRUSTEP	Foot correcting orthotic	<a href="https://www.trustep.com/">https://www.trustep.com/</a>
TRUSWEAT	Clothing	<a href="http://trusweat.com/">http://trusweat.com/</a>
TRUSWEETS	Organic candy	<a href="https://www.trusweets.com/">https://www.trusweets.com/</a>
TRUTECH	Shoes	<a href="https://www.rockport.com/technology.html">https://www.rockport.com/technology.html</a>
TRU-TRONICS	Electronic cable assemblies	<a href="http://www.trutronics.com/">http://www.trutronics.com/</a>
TRUTV	American TV channel	<a href="https://www.trutv.com">https://www.trutv.com</a>
TRUVAL	Jewelry purchasing and sales services	<a href="https://truval.com">https://truval.com</a>
TRUVALUE HOMES	Manufactured homes	<a href="https://www.truvaluealexandria.com/">https://www.truvaluealexandria.com/</a>
TRUVIA	Sugar substitute	<a href="https://www.truvia.com/">https://www.truvia.com/</a>
TRUVIVITY	Nutritional supplement	<a href="https://www.amway.com/en_US/Shop/Nutrition/Vitamins-%26-Supplements/Targeted/Truvivity-by-">https://www.amway.com/en_US/Shop/Nutrition/Vitamins-%26-Supplements/Targeted/Truvivity-by-</a>

		<a href="https://www.nutrilon.com/Products/Infant-Formula/Infant-Formula-System/p/273016">Nutralite%26trade%3B-Hydrating-System/p/273016</a>
TRUWATCH	Home security services	<a href="https://truwatch.com">https://truwatch.com</a>
TRU-WIN	Cables and connectors	<a href="https://www.winconn.com/brand/tru-win">https://www.winconn.com/brand/tru-win</a>
TRUWOMEN	Vegan protein bars	<a href="https://www.truwomen.com/">https://www.truwomen.com/</a>
TRUWOOD	Residential home siding	<a href="https://truwoodsiding.com">https://truwoodsiding.com</a>

## IX. Third-Party Uses Of TRULIANT

72. Exactech, Inc. owns a federal registration for the mark **TRULIANT** in International Class 10 for “[o]rthopedic and surgical implants made of artificial materials, namely, knee implants and instrumentation for implantation thereof,” Reg. No. 5,206,010. Attached as **Exhibit 176** is a copy of the trademark registration certificate and TSDR status and title record.

73. Exactech promotes and advertises TRULIANT throughout the United States for its suite of knee implants and knee surgery tools, as shown below and more fully in **Exhibit 177**, which contain true and correct copies of webpages reflecting such use. (e.g.,  
[https://www.youtube.com/watch?v=A4Rp5\\_j6pqg](https://www.youtube.com/watch?v=A4Rp5_j6pqg);  
<https://www.youtube.com/watch?v=s8XDPitCj64>;  
[144](https://www.exacdev.com/wp-content/uploads/2019/06/12-</a></p>
</div>
<div data-bbox=)

[0000131 Truliant Knee System Design Rationale Web.pdf;](#)

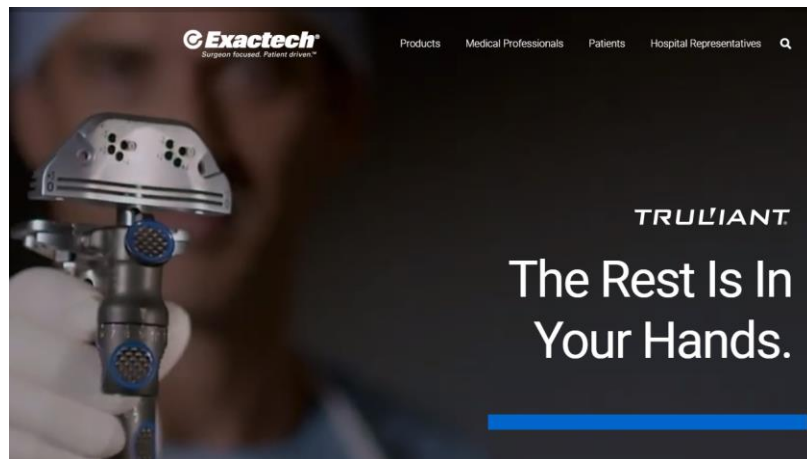
<https://twitter.com/ICJRortho/status/1010139484074201089?s=20;>

<https://twitter.com/ODTmagazine/status/899692839067672578?s=20;>

[https://twitter.com/G70562165/status/1077348512470351874?s=20\)](https://twitter.com/G70562165/status/1077348512470351874?s=20)



**TRULIANT**  
Total Knee System





RGue  
@G70562165

Truliant Knee System by Exactech, silver winner, is a bone and joint restoration product used to streamline the knee replacement surgery. It comes with adjustable platforms and molds to suit all individuals.

[exac.com](http://exac.com)



6:41 PM · Dec 24, 2018 · [Twitter Web Client](#)



ICJR  
@ICJRortho

Watch Dr. Tomas Nemickas perform a TKA with ExactechGPS® TKA Plus and the Truliant® Knee System live on [ICJR.net](http://ICJR.net), starting now: [bit.ly/2lc5hyN](http://bit.ly/2lc5hyN)



8:36 AM · Jun 22, 2018 · [TweetDeck](#)

74. Exactech's Truliant branded suite of knee implants and knee surgery tools are sold through medical device distributors throughout the United States, including in North Carolina, such as Academy Medical, who is located in Charlotte. See **Exhibit 178**, <https://academymedical.net/exactech-has-now-been-added-to-the-sac-top-20-national-prosthetics-implant-contract/>.

75. Additionally, an entity has used the name **Truliant Health Systems, LLC**, to offer behavioral health services in Charleston, South Carolina, Forest Park, Georgia. A true and correct copy of the results of a status query on the South Carolina Secretary of State's website, showing that Truliant Health Systems, LLC is a South Carolina corporation currently in good standing, is attached as **Exhibit 179**. A copy of a previously-issued certificate of organization for Truliant Health Systems LLC, maintained by the State of Georgia Secretary of State and obtained from its website, and the results of a status query for that entity, is attached as **Exhibit 180**.

**X. Geographic Locations Of Truliant Federal Credit Union Branches Compared To Truist Branches**

76. I have reviewed the locations of Truliant Federal Credit Union branches as compared to the locations of Truist Bank branches (formerly BB&T and SunTrust branches). To do so, I uploaded an Excel spreadsheet containing the addresses of Plaintiff's branches (compiled from its website, see Exhibit

7, <https://www.truliantfcu.org/Ways-to-Bank/Branch-ATM-Locations>) and a spreadsheet containing the addresses of Truist's branches, to Google.com's My Maps tool, which then plotted each address on a map of the United States. I identified only three locations where a Truliant Federal Credit Union branch appeared to be in within sight of a Truist Bank branch, which are identified below. I used the satellite view on the Google Maps website (Google's <https://maps.google.com/>) to create the photographs showing locations of the branches.

\\

\\

\\

\\

\\

\\

\\



a. Greenville, South Carolina

- i. Truliant Federal Credit Union: 3621 Pelham Road, Greenville, SC, 29615
- ii. Truist Bank (formerly BB&T): 3841 Pelham Road, Greenville, SC, 29615



b. Burlington, North Carolina

i. Truliant Federal Credit Union: 1205 University Drive, Suite 114, Burlington, NC, 27215

ii. Truist Bank (formerly BB&T): 1175 University Drive, Burlington, NC 27215



c. Charlotte, North Carolina

i. Truliant Federal Credit Union: 14318 Rivergate View Drive,  
Unit 300, Charlotte, NC, 28273

ii. Truist Bank (formerly SunTrust): 12916 Walker Branch  
Road, Charlotte, NC, 28273



I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief, this 15 day of May, 2020.

*a u f*

---

Rita Weeks